

Draft Oxfordshire Waste Planning Strategy

Consultation (September 2011)

Main Document

ID	Response
EXECUTIVE SUMMARY	
233 Ox City	<p>The Vision and Objectives are generally supported. However it is considered that the overarching vision as set out in the Executive Summary should clearly state the waste hierarchy to 'reduce, reuse and recycle'.</p> <p>Suggested change: First part of paragraph 8 to read: "The strategy, policies and proposals are based on a vision and objectives for waste planning in Oxfordshire. These reflect the Waste Hierarchy which applies a 'reduce, reuse, recycle' approach. The vision has three strands..."</p>
132 CPRE	<p>The Oxfordshire Branch of the Campaign to Protect Rural England (CPRE) welcomes the opportunity to comment on the draft Waste Planning Strategy.</p> <p>The Oxfordshire Branch of the CPRE was established 80 years ago as an independent charity to promote the beauty, tranquillity and diversity of rural Oxfordshire by encouraging the sustainable use of land and other natural resources in town and country. We therefore have an interest in any waste plans which may adversely affect the rural landscape of the county.</p> <p>Overall</p> <p>CPRE welcomes OCC's Waste Planning Vision, with its integral commitment to a 'Waste Hierarchy', which places in order of priority waste minimization, re-use and recycling and, lastly, disposal by incineration and landfill.</p> <p>We commend OCC's vision for Oxfordshire's waste planning strategy, which says that by 2030 there will have been a "transformation in the way Oxfordshire manages its waste", with:</p> <ul style="list-style-type: none">-- increased recycling and composting of waste;-- treatment (so far as is practicable) of all residual waste that cannot be recycled or composted; and-- only the minimum amount of waste that is necessary being disposed of at landfill sites. <p>CPRE Oxfordshire welcomes the current achievements of OCC regarding the proportion of municipal waste stream which is recycled</p>

and the contribution which this will make in future to reducing the amounts of waste which need to go to landfill and for incineration.

However, we believe OCC could do more to prioritise waste reduction, minimisation and reuse. Under the targets set out in the draft Waste Strategy, we fear that much municipal waste could still end up being incinerated and sent to landfill, with unacceptable environmental impacts.

CPRE would like to see challenging targets being set by OCC for waste minimisation and we believe the provision of new landfill sites and waste incineration plants should be strictly limited, and dependent on OCC having achieved demanding targets for waste reduction and recycling.

Provision should happen only after waste disposal options further up the waste hierarchy have been exploited. Landfilling and incineration should no longer be viewed as the acceptable default option where recycling ventures have failed.

CPRE also welcomes the increasing reliance of OCC on technologies such as gasification and anaerobic digestion to reduce waste going to landfill and incineration.

CPRE also believes that the planning and development of new houses and flats in Oxfordshire over the coming years provides a crucial opportunity to install recycling facilities at the outset and to ensure that all new builds can be served by doorstep collections. Similar consideration should be given to the design of commercial properties.

CPRE would also like to see more challenging targets for recycling in the county. We would like to see improved recycling schemes, so that doorstep collections of recyclable waste are the same across the districts, and the range of materials accepted for recycling broadened across the county.

We are also supportive of OCC's commitment to making the county largely self-sufficient in dealing with the waste it generates, and to reducing 'waste miles'. We also broadly agree that new waste facilities should be located near to towns and transport links, with the caveat that we would object to any plans for industrial scale plants for processing or recycling of waste in open rural locations, in the Green Belt and in AONBs.

CPRE Oxfordshire objected to the planning application for an incinerator at Ardley on the grounds of its perceived damage to the surrounding rural landscape. We were very disappointed when the incinerator was granted planning permission.

We remain seriously concerned that this plant will require a continuing

	<p>large flow of waste material to justify the large sum invested in its construction, reducing the incentive to increase rates of recycling in the county; and that the importation of large quantities of waste material from outside the county will be necessary to make the operation of such a large-scale facility economic.</p> <p>CPRE also objected to the planning application for a Mechanical Biological Treatment plant at Sutton Courtenay on the grounds of its perceived impact on the surrounding rural landscape. We were delighted when the planning application was rejected and we hope it does not go to appeal. However, we remain concerned that the Sutton Courtenay area is earmarked to become a regional waste hub.</p> <p>Any future plans for industrial scale plants for processing or recycling of waste in rural locations in Oxfordshire will be unacceptable to CPRE. However, we will look favourably upon proposals for smaller waste facilities sited in industrial locations, close to conurbations, making the provision of Combined Heat and Power (CHP) possible.</p>
INTRODUCTION	
120	<p>The officers are to be commended in their first attempt in addressing the Minerals and Waste Strategies, though unsurprisingly I suggest that considerable amendment and further public consultation will be required before it is submitted to the Secretary of State. It is crucial that we get this right and I hope the following helps in that.</p>
97 SC PC	<p>As far as the Waste strategy is concerned the Parish Council is concerned to note in the introduction that it is stated to be Oxfordshire County Council's preferred strategy. At this stage in proceedings, it is surely a proposed strategy and not one which has been chosen from a number of alternatives. If it is a preferred strategy then the County Council must have in mind possible sites for its operations, yet it is stated that it is not site specific and sites are to be identified in subsequent documents.</p> <p>The purpose of appropriate documentation would be to allow consultees to gauge the impact on its area and to assess any adverse impacts. Given the number of inaccuracies in the document the Parish Council would ask for the inconsistencies to be corrected, figures properly justified. The errors and omissions should be corrected and the documents submitted again to public consultation. The sums just do not add up, and the predictions do not make sense.</p>
BACKGROUND	
171 Ox City	<p>The recognition that the Waste Strategy should be consistent with the existing and emerging local development frameworks of the City and District councils is wholeheartedly supported.</p>
179 Premier	<p>MJCA are commissioned by Premier Aggregates Limited to review the Oxfordshire Waste Planning Strategy Consultation Draft and provide comments. Premier Aggregates Limited are an independently owned mineral and waste management contractor based at Finmere Quarry in the north of Oxfordshire. Finmere Quarry has the benefit of planning permissions for a non hazardous waste landfill, a materials recycling</p>

	<p>facility (MRF) and an inert waste landfill which incorporates traditional recycling methods. With respect to the MRF in April 2011 Oxfordshire County Council resolved to grant planning permission for the addition of gasification and biodrying waste treatment technologies to the consented MRF operations and to extend the life of the MRF and non hazardous landfill to 2035. Finmere Quarry provides an important facility for the integrated management of commercial and industrial waste in the County. We note that on Figure 2 Finmere Quarry is identified as a non hazardous landfill but the materials recycling facility is not identified. We should be grateful if the materials recycling facility could be referred to in the submission draft of the Waste Planning Strategy.</p>
<p>VISION AND OBJECTIVES</p>	
<p>7 Bucks</p>	<p>We consider that the relationship between the vision, objectives and policies are not explicit. It was recommended by a Planning Inspector at an advisory meeting with Buckinghamshire County Council (BCC) in 2010, to provide a matrix which expresses how each element of the vision is to be delivered through related objectives and how each objective is to be achieved through the policies, the Inspector stated:</p> <p>"...it is worth emphasising the need for the Plan to have a thread running through it, so that it is possible to see how the strategy and polices give effect to the various parts of the Vision and Objectives; and conversely the derivation of the strategy and policies. A matrix or series of matrices is suggested as a way of ensuring this".</p>
<p>29 Didcot</p>	<p>We find the document disappointing. At the top of the Waste Hierarchy (see page 16) is to prevent waste from arising in the first place. None of the 3 bullets in the Vision and Objectives (6 on p5) relate to reducing the amount of waste which is produced. It needs to be made clear that preventing waste from arising in the first place is an essential part of the strategy.</p>
<p>61</p>	<p>We support the general vision as outlined of diverting waste from landfill, energy recovery and recycling.</p> <p>We do have concerns over the baseline data, facility capacity, the suitability of materials for recovery and the knock on effects on landfill.</p> <p>Other concerns relate to the distribution and limitations on the number and type of facilities and how imports of waste are to be managed from neighbouring authorities and self sufficiency.</p>
<p>121</p>	<p>5. Mineral and Waste Strategies - Vision, Principles and Objectives.</p> <p>a. In both cases the Vision, Principles and Objectives should be strengthened to ensure that local communities are protected against unnecessary development. In addition to the proximity principle to ensure the minimisation of traffic, it should state that the size of plants is kept to that accurately assessed as necessary for local need and no extra allowance is to be made for commercial benefit. As the authors know this is already indicated in the C&I Recycling paragraph in Annex 1 on the Overall Waste Provision, which states that "facilities should be sized in relation to the quantity of waste expected from that</p>

	<p>locality" but it needs to be repeated in the C&I Residual waste paragraph, as well as being stressed in the Visions, Principles and Objectives.</p> <p>b. In this particular reference should also be made to reducing imports of waste by pressurising London, Berkshire and other authorities to deal with their own waste rather than exporting it to Oxfordshire and including the essence of paragraph 4.15 in the Vision.</p> <p>c. Currently the correlation between the two strategies makes it impossible to ascertain where facilities will be developed and there is no reference to the potential cumulative impact in local areas. The Vision should include reference to spreading the load and ensuring that the cumulative impact of the two strategies and existing and new plant is not unfairly detrimental to particular communities.</p>
<p>74 Hint W</p>	<p>We should seek to renovate more buildings rather than demolishing, thereby reducing the amount of building rubble taken to tip. Where it is necessary to dispose of building rubble it should all go to a recycling depot where it is recycled for use as sub base material for new and improved roads and accesses. This would reduce the use of sand and gravel stocks in the county. This is to be supported in Policy M1.</p> <p>All such material presented for recycling should be free of tipping charges as there is significant value in having recyclable materials for use in the county.</p> <p>All carriageways that require reconstruction work should be assessed for in-situ recycling, thereby avoiding carting away of the damaged carriageway materials and bringing in new materials. (Environmentally better plus carbon saving). Firms such as Colas are experts at this. This would also reduce the use of sand and gravel stocks in the county.</p>
<p>152 Alk PC</p>	<p>Waste Planning Vision We agree with the three points constituting the waste planning vision.</p> <p>Waste Planning Objectives We agree with the waste planning objectives</p>
<p>170 Ox City</p>	<p>The Vision and Objectives are generally supported. However it is considered that the overarching vision as set out in the Executive Summary should clearly state the waste hierarchy to 'reduce, reuse and recycle'.</p> <p>Suggested change: First part of paragraph 8 to read: "The strategy, policies and proposals are based on a vision and objectives for waste planning in Oxfordshire. These reflect the Waste Hierarchy which applies a 'reduce, reuse, recycle' approach. The vision has three strands..."</p> <p>The objectives listed are generally supported, provided that the following points are addressed: Objectives (iii) and (iv): The objectives to manage waste as close as possible to where it arises, minimise the distance waste needs to be transported by road, and take opportunities to locate facilities in or</p>

	<p>close to the communities they serve, are welcomed. It is considered that the decision to limit the acceptance of household waste to weekends only at the Redbridge Household Waste Recycling Centre is in direct conflict with these objectives.</p> <p>Suggested change: See response to Policy W5.</p> <p>Objective (vi): It is agreed that Objective (vi) should give priority to previously developed land, potentially including within the Green Belt, as this can include redundant industrial land, military bases etc. However the objective should be clearer that urbanised or populous areas (for example surrounded by housing) should not be prioritised over greenfield sites.</p> <p>Suggested change: Objective should read: "Give priority to the use of previously developed land, including land within the Green Belt if appropriate, and ensure that provided that new waste management facilities are sensitive to the amenities of local communities, are appropriate to their context, and do not cause unnecessary harm to the County's distinctive natural and built environment."</p>
182 Surrey	The vision and preferred strategy for the Oxfordshire Waste Plan are generally supported.
185	<p>The vision outlined for waste planning in Oxfordshire is based on the following principles:</p> <ul style="list-style-type: none"> - Transformation of the way waste is dealt with, to increase recycling, composting and treatment, and minimise disposal by landfill; - Provision of waste facilities to enable the County to continue to be largely self sufficient in dealing with its waste; and - Location of waste facilities close to towns and main transport links, to reduce the distance waste needs to be moved. <p>Lafarge Aggregates support the vision and objectives for waste planning in Oxfordshire.</p>
210 NE	Natural England supports the Waste Plan Vision.
103 SODC	<p>The overall Waste Planning Vision (3.4) is supported but it does not go far enough. It should also include a commitment to see a substantial reduction in the amount of non hazardous waste imported into Oxfordshire from London and elsewhere, whether for disposal by landfill or for treatment or for any other purpose.</p> <p>In association with this, whilst the thrust of Waste Planning Objective (3.5/v) is supported, it is currently too vague and must be more specific. It should address not only waste that is imported for landfill but also waste that is imported for treatment or for any other purpose. The objective should also set or require to be set a specific target or targets, for example, one for landfill, one for other treatments and purposes and / or by waste type, to take account of the potential need for a different approach for hazardous and radioactive waste. The target(s) should set</p>

	<p>the level to which imports should have dropped by the end of the plan period and also at key points during the plan period (every five years perhaps). There should be further consultation on these targets.</p> <p>The other Waste Planning Targets at 3.5 are endorsed, particularly objectives 'i' and 'viii', to which we would not wish to see any amendments made, without the opportunity for further consultation.</p>
111 Vale	<p>The overall Waste Planning Vision (3.4) is supported but it does not go far enough. It should also include a commitment to see a substantial reduction in the amount of nonhazardous waste imported into Oxfordshire from London and elsewhere, whether for disposal by landfill or for treatment or for any other purpose.</p> <p>In association with this, whilst the thrust of Waste Planning Objective (3.5/v) is supported, it is currently too vague and must be more specific. It should address not only waste that is imported for landfill but also waste that is imported for treatment or for any other purpose. The objective should also set or require to be set a specific target or targets, for example, one for landfill, one for other treatments and purposes and / or by waste type, to take account of the potential need for a different approach for hazardous and radioactive waste. The target(s) should set the level to which imports should have dropped by the end of the plan period and also at key points during the plan period (every five years perhaps). There should be further consultation on these targets.</p> <p>The other Waste Planning Targets at 3.5 are endorsed, particularly objectives 'i' and 'viii', to which we would not wish to see any amendments made, without the opportunity for further consultation.</p>
76 Bampt	<p>Bampton Parish Council strongly supports: 3.4 a) 3.5 ii, vi,vii and viii</p>
88 BEWG	<p>Bampton Environmental Watch Group (BEWG)strongly supports: 3.4 a) 3.5 ii, vi,vii and viii</p>
246 Banbry	<p>The Council would also generally concur with the three strands of the vision and objectives for the strategy, particularly the need to locate waste facilities close to towns and main transport links. Minimising the amount of waste going to landfill is also important.</p>
DRAFT STRATEGY (GENERAL/INTRO)	
236	<p>A further general comment about the document, it is in need of detailed editing and reordering to make the development of ideas flow smoothly, instead of at present, the need to continually go forwards and backwards to check up on details. This document and its policy principles have come at a very important time for Oxfordshire, and it is vital that no arbitrary policy decisions are made in a hurry which could have the effect of blighting the county for years to come.</p>
43	<p>Overall, while I appreciate the need to plan ahead and make provision for new need, especially with landfill taxes rising, I find the overall thrust of the document very confusing with many of the conclusions unsubstantiated and seemingly plucked from the air. This is largely</p>

	<p>because I find the supporting data and statistics confusingly presented. This is despite spending considerable time looking through the other supporting documents to the draft, none of which appear to make the data much clearer.</p> <p>To conclude, if the Draft Waste Planning Strategy is meant to generate discussion, there is plenty to discuss. If it is meant to present a cogent and well argued arrangement of data, assumption and conclusions, it falls far short of the mark and needs to be thoroughly overhauled. Frankly, some of the conclusions are akin to pulling rabbits out of hats and the linkage between the conclusions and the supporting data needs to be much better presented and articulated.</p> <p>I genuinely hope this leads to a revised draft for circulation that addresses all the issues raised above. Thank you also for the opportunity to comment.</p>
50	<p>The document makes no mention of the potential for re-use of domestic "waste". Many people prefer to discard serviceable items in order to avoid the trouble of advertising, even if they are happy to give things away to a good home.</p> <p>The disadvantages are two-fold:</p> <ol style="list-style-type: none"> 1. The "throw-away" attitude in the community is reinforced, with the consequent increase (or at least no decrease) in domestic waste. 2. Such action implies the expenditure of energy and resources in both the recycling process and the manufacture of replacement goods. <p>Even some non-functioning items have use as sources of spare parts (e.g. bicycles, lawnmowers, hardwoods, etc.). The pervasive worry about litigation is largely ill-founded, especially considering the present government's views on taking personal responsibility for ones own decisions, and on protection from spurious litigation. For example: cutting the plug off an electrical item renders it unfit for purpose, so a new owner refitting one constitutes an act of manufacture and it becomes his responsibility.</p> <p>Although the quantity of such re-useable material is a very small proportion of the whole, the advantages in inculcating an attitude of economy and respect for the environment would be beneficial. Such re-use sites could be operated by volunteers, with the proceeds of sales being returned to the community. The Big Society in action. Some parishes might consider operating their own system.</p>
149 CPRE	<p>CPRE has major concerns about the impact of fly-tipping on the countryside and generally, and we have made representations to the DEFRA Review of Waste Policy suggesting a can and bottle deposit scheme as an effective means of achieving a reduction in fly-tipping. We welcome OCC's commitment to reducing fly-tipping, and note that the amount of material dumped in this way in the county has been reduced by 40% over the last five years. However, we believe there is room for improvement.</p>
151 Alk PC	<p>OCC should consider itself as an outsourced supplier with responsibility to the public to provide a high level of service. Therefore there should be commitments to increase the frequency of local review</p>

	<p>meetings, the frequency and visibility of service level information, and operators should be required to provide funds so that separate independent monitoring can be carried out to validate the operator's measurements.</p> <p>The waste sites allocations document has not yet been published. However, it is essential to enable a considered response to this draft. When the site allocations are made known, we anticipate that we will respond further on the proposed waste planning strategy and we reserve the right to further participation in that document.</p> <p>We expect the County Council to observe their commitment to Community Involvement by taking our views into account - both on the current published draft strategy - and on any further documentation submitted to us after the deadline of October 31st 2011.</p>
189 EA	<p>At this stage, because no specific sites are allocated, it is difficult to comment specifically on individual sites. Many of our concerns in respect of flood risk for minerals sites will also apply to waste sites. We note the similarity between the common core policies contained in both the Minerals and Waste strategy and we ask that our comments above are also applied to the waste strategy in addition to the following:</p> <p>Waste Developments</p> <p>The core strategy should promote the fact that waste does not always have to be a bad neighbour and can take place alongside present industrial and commercial development in some instances. There should be a policy which promotes waste segregation, sorting and collection of separate waste streams, particularly from large new developments and especially sites which may be used for secondary aggregates. This would foster economic development and diversification in waste activities.</p>
196 ChilCB	<p>The Board considers the Strategy to be generally sound.</p>
199	<p>These representations are submitted by Turley Associates on behalf of our client Frobisher Renewables Limited. Frobisher's comments are made in relation to the overall strategy and strategic policies set out in the consultation documents and are made against the background of their interest in the site known as Wicklesham Quarry, south of Faringdon. Frobisher Renewables Limited has an interest in the site and is currently reviewing the potential for the use of the quarry site for the purposes of a recycling and renewable energy centre.</p> <p>These representations are accompanied by the appropriate submission forms (for both the minerals and the waste consultation documents). The comments primarily relate to the draft Waste Planning Strategy however comment has also been made in connection with a specific policy in the draft Minerals Planning Strategy. In addition to the main strategy documents, we have briefly commented on Background Paper No. 3 relating to quarry restoration.</p> <p>The Draft Waste Planning Strategy</p> <p>Our client is generally supportive of the principles that underpin the</p>

	<p>proposed strategy. That is, the acknowledgement of the need to provide additional facilities throughout the plan period, the increased emphasis on the importance of waste management rather than waste disposal and the strategy of decentralising the provision of facilities to increase sustainability and reduce transport requirements.</p>
209	<p>It is notable that the draft waste strategy contains no specific policies with regard to the conversion of waste to energy (although the reference to the Ardley facility is acknowledged). PPS22 emphasises the importance of increasing the development of renewable energy resources and, given the links to waste, we consider that the waste strategy should acknowledge the potential and growing importance of energy from waste facilities. PPS22 specifically identifies energy from waste as a form of renewable energy that is covered by policies within the statement. The key principles, set out within the PPS, which local planning authorities should follow when approaching planning for renewable energy, include the promotion and encouragement of renewable energy resources in a way that recognises "the full range of renewable energy sources, their differing characteristics, locational requirements and the potential for exploiting them subject to appropriate environmental safeguards." (para 1 (ii)).</p> <p>With this in mind and in order to align the Oxfordshire Waste Strategy with national policy guidance, the strategy should provide a policy framework that will guide other emerging policy documents of relevance. We would suggest therefore that an additional policy is added to address this point. This policy could be located after policy W6 and relate to the provision of localised energy from waste facilities.</p>
244 Readng	<p><u>Waste Planning Strategy</u></p> <p>The Council has no comments to make on this document.</p>
W160 Alk PC	<p>These policies should be modified to give local communities and parish councils or otherwise the right to be consulted and provide information and opinion at the planning stage. In many cases, they will have detailed local knowledge that is not available to other agencies. Local information could include areas liable to flood risk, ground water flows after excessive rainfall or snow, amenity as perceived and experienced by residents, specific habitats and biodiversity, the transmission of noise and dust as influenced by local wind patterns and the topography, local road usage and traffic movements and needs for rights-of-way. The parish of Shenington with Alkerton includes:</p> <ul style="list-style-type: none"> - a designated Conservation Area - a Scheduled Ancient Monument - a Conservation Target Area - designated Local Wildlife Sites - an area of outstanding natural beauty - listed buildings - tourist attractions - a primary school - a medical centre - a historic WW2 airfield

	<p>- an international go-karting track as well as: - existing and proposed mineral workings - existing waste facilities</p> <p>If The Trustees of the Needler D4 Settlement start extracting ironstone in the neighbourhood, the parish will become highly stressed and unable to accept other minerals or waste developments. Even so, the parish is a sensitive receptor where special attention is required during planning stages to ensure developments unacceptable to the local community do not take place.</p>
259 Launton PC	At its meeting on the 6th October 2011 Launton Parish Council resolved that it had no comment to make concerning this consultation.
POLICY W1: WASTE TO BE MANAGED	
23 Banbry	The County should however aim to be self sufficient in its provision of facilities for dealing with waste and avoid building in overcapacity in order to take in waste from further afield.
8 Bucks	We support Policy W1 which seeks to make provision in order that Oxfordshire is net self sufficient in managing its MSW, C&I and C&D waste arisings throughout the Plan period.
15 Earthln	Table 2 This shows a doubling of CD&E waste and requirement for recycling and landfill between 2010 and 2015. Reality check needed.
30 Didcot	<p>Paragraph 2.18 states "By moving the management of waste up this hierarchy, away from disposal to reuse, recycling, composting and treatment to recover resources, the Government aims to achieve more sustainable waste management and to break the link between economic growth and the environmental impact of waste. The County Council shares this aim." [our emphasis]. The OCC Waste Strategy should be about managing a reducing amount of rubbish.</p> <p>The policy is however based on increases of 19% Municipal Solid Waste (MSW), 12% Commercial and Industrial Waste (C&I), and 100% Construction, Demolition and Excavation Waste (CDE) between 2010 and 2030. These need to be revisited.</p> <p>4.6 explains that the MSW figure is based on "no further increase in the amount of waste produced by each household". Since households are getting smaller, the amount of waste produced per household should reduce. It is also not clear if the assumed increase in population has been adjusted to reflect the trend to smaller households.</p> <p>We would also like to see some allowance made for people reducing the amount of rubbish which they produce.</p> <p>According to 4.7, C&I waste growth is assumed to be small (actually 12% over 20 years). It is not clear why the amount produced has been assumed to grow at all. Businesses have a strong incentive to reduce the amount of rubbish which they generate as its disposal is a direct cost on the business.</p>

	<p>We agree that CDE waste will increase when the economy picks up. It is unclear however to what extent economic growth in the future will be driven by large construction projects.</p>
21	<p>The levels of waste generated locally seem to be overestimated, taking little account of the fact that recycling in the Vale, for example, has already risen from 36% to 70% since October 2010; whereas the document mentions only 62% across the county by 2020.</p> <p>Closure of Didcot A will surely reduce the production of Oxfordshire C&I waste very significantly- but this does not seem to have been taken into account.</p>
25	<p>Recycling has risen tremendously in the Vale and with the closure of Didcot A power station industrial waste will fall.</p>
47	<p>I also do not know what the impact of the closure of Didcot A will be on the volumes of C&I and it would be good to see this referred to in the text in order to show it has been taken into account. My worry is that, without further clarity and evidence, there may be over provision of unnecessary facilities for C&I waste.</p>
62 Grundn	<p>Commercial and Industrial waste arisings (W1)</p> <p>The amount of Commercial and Industrial waste arisings is based upon the DEFRA 2009 survey. The Plan admits that these have been effected by the recession but makes no effort to quantify this or to adjust for any uplift as the economy picks up. The growth figure to 2030 is at a lower rate than for MSW and is itself therefore questionable.</p> <p>It would have been prudent to have included figures for 2007 i.e. a pre recession level and to have used a range of arisings to plan for.</p> <p>The DEFRA survey details arisings and their management at a Regional level only and do not break them down to a sub-regional level and therefore assumptions can only be made as to the level of arisings and to how they are managed. The survey is a crude assessment based on a very limited survey of a small sample of businesses. It was voluntary and only undertaken on one day therefore is unrepresentative missing longer term trends and may miss material streams. There are simple ways to check the accuracy of the data. One is to compare the amount the survey said is landfilled to that of the EA data for 2009. The survey indicates that some 1,308,117 tonnes was landfilled. The EA data from their Waste Data Interrogator for 2009 details that 3,429,922 tonnes was landfilled; deducting MSW (1,635,421 tonnes) results in a figure of C&I waste to landfill of 1,794,503 tonnes. This represents a near 40% underestimation of the amount of C&I waste to landfill reported in the DEFRA study compared to the data obtained from the EA. This casts some doubt of the accuracy of the survey.</p> <p>The survey was undertaken at the time of a recession of equal severity and duration to that of the 1930's. The difference from the EA survey of 2002/3 to that of the DEFRA survey is a fall of 29% even though</p>

	<p>economic activity was sustained until 2008. Such a fall seems unlikely.</p> <p>In 2008 non hazardous landfill from Oxfordshire is quoted as 634,202 tonnes (appendix 3 table 3/8). If MSW is deducted of some 190,000 tonnes this leaves around 444,000 tonnes being C&I waste. Given the quoted 50% C&I recycling rate would imply arisings of 888,000 tonnes which is more in line with other surveys.</p> <p>These factors indicate that other data should have been used to give a more accurate data range upon which to base arisings.</p> <p>CD&E arisings (W1, M1)</p> <p>A range of arisings are detailed and it is not clear where a figure of 1,300,000 tonnes has been derived. It is envisaged that 780,000 tonnes will be recycled. Presumably this is a mixture of recycled aggregate and of soils and other products.</p> <p>Policy M1 states that the amount of recycled and alternative aggregates to be supplied amounts to 900,000 tonnes per year. This includes a contribution from Didcot (125,000t) however it is to close in 2015. This may partially be replaced by recycled bottom ash from Ardley EfW (60,000t). This gives a net contribution of recycled aggregates to the amount of 840,000t. This is in excess of the figure in W1 and ignores any contribution that recycled soils etc will also make to that figure. Policy M1 implies that with the addition of recycled soils etc that up to 1,000,000 tonnes would be recycled compared to the 780,000t in W1.</p> <p>Whilst there may be recycled aggregate productive capacity of 800,000t it is not clear if this is a mixture of recycled aggregates and soils etc. There has been no assessment of CD&E arisings in relation to the quantity and suitability for recycled aggregates. Their suitability is dependant upon the amount of brick and concrete generated.</p> <p>Given that historic production of alternative aggregates, including Didcot, was at most 450-500,000 tonnes means that to achieve a figure of 900,000 the output of recycled aggregate needs to more than double. Given that the Atkins report concludes, as have others, that there is little room for increasing output as most suitable material is already captured this means that the targets in M1 are neither realistic nor deliverable and contradict those in W1.</p>
100 SC PC	<p>It is extremely confusing and difficult to understand how the statistics have been generated and the origins of them. How can accurate forecasts as to need be made when, for example, there are statements made such as "there is considerable uncertainty around the amount of C & I waste in Oxfordshire" (para 3.19) or "It is difficult to assess the extent to which waste arisings are currently affected by the economic downturn" (para 3.27) or "the capacity gap shown in table 21 is largely a theoretical one" (para 6.8). There is no indication of which models have been used to calculate the figures. They appear to be random</p>

	<p>figures plucked from the air. Point 4.4 "waste could increase", point 4.5. "other waste is expected to increase", point 4.6. "for municipal waste it is assumed," point 4.26 "estimated additional provision needs to be made". The draft appears to be based on guesswork rather than on proper analysis.</p>
104 SODC	This policy is supported.
112 Vale	This policy is supported.
128	<p>I fail to understand why, when total combined volumes of waste either generated within or imported into the county are forecast to decline (by 38% between 2010 and 2030), why future waste provision requirements are forecast to increase. Again, breakdown by type of waste capacity for both internally and externally generated waste over the period would be helpful.</p> <p>Reading between the lines for future C%I waste volumes, it appears there are several caveats in the text of the main draft and the supporting documents that undermines confidence in these estimates....'considerable uncertainty'...'difficult to assess' come to mind. The capacity gap is referred to as a 'largely theoretical one' and that there may actually be 'a healthy surplus of capacity'. It appears that there may well not be a capacity shortfall at all therefore, while the draft strategy very strangely concludes there will be a shortfall. These statements are irreconcilable.</p>
133 CPRE	<p>Policy W1: The amount of waste to be provided for</p> <p>We are supportive of OCC's commitment to making the county largely self-sufficient in dealing with the waste it generates.</p>
214 ConRec	<p>Paragraph 4.7/Table 2</p> <p>1. There is no explanation made in paragraph 4.7 of the Oxfordshire Waste Core Strategy Consultation Draft (OWCS) for the statement that production of construction, demolition and excavation (C, D & E) waste is believed to have fallen sharply to about half normal levels. It is furthermore not the experience of those in the industry that levels have fallen so sharply. It appears that this statement is derived from the Waste Needs Assessment May 2011, which makes an assumption at paragraph 3.34, that because housing completions had dropped by 50% to 2010, the amount of CDE waste being managed has halved. This assumption takes no account of other significant elements of the building sector and major contributors to the generation of C, D and E waste, namely the commercial, public (hospitals, schools etc) and roads sectors, which have not declined at anything like the rate suggested. The assumption therefore at paragraph 4.7 and in the first column of Table 2 of the OWCS that the volume of C, D & E waste to be managed at 2010 is incorrect.</p>
220 Sheehn	Paragraph 4.7/Table 2

	<p>1. There is no explanation made in paragraph 4.7 of the Oxfordshire Waste Core Strategy Consultation Draft (OWCS) for the statement that production of construction, demolition and excavation (C, D & E) waste is believed to have fallen sharply to about half normal levels. It is furthermore not the experience of those in the industry that levels have fallen so sharply. It appears that this statement is derived from the Waste Needs Assessment May 2011, which makes an assumption at paragraph 3.34, that because housing completions had dropped by 50% to 2010, the amount of CDE waste being managed has halved. This assumption takes no account of other significant elements of the building sector and major contributors to the generation of C, D and E waste, namely the commercial, public (hospitals, schools etc) and roads sectors, which have not declined at anything like the rate suggested. The assumption therefore at paragraph 4.7 and in the first column of Table 2 of the OWCS that the volume of C, D & E waste to be managed at 2010 is incorrect.</p>
177	<p>I write as a concerned local resident to express my misgivings about the latest Strategy and its likely effects (among others) on the contentious site at Sutton Courtenay. I have lived in the area for just over 20 years, always within 5 miles of the site, and since the spring of 2008 I have been Organist and Choirmaster of All Saints' Parish Church in the village.</p> <p>I appreciate both the difficulty and urgency of maintaining and developing a Waste Strategy, but I wonder whether the conflicting demands of haste and a plethora of government Diktats has not resulted in a confused and unworkable document. The cross-referencing leaves a lot to be desired, while if we take 'strategy' in its original military sense, it presupposes as sound a possible a grasp of existing facts and figures in order to evaluate and evolve a decisive response ~ with a reasoned and reasonable chance of staying ahead of the game.</p> <p>I am reminded of the classic recipe for farce (be this of the Feydeau/domestic genre, or the institutional Men-from-the-Ministry type) where a ridiculous number of misassumptions, half-truths etc piles up until it is topheavy and then collapses amid general consternation. But issues of the present type and magnitude surely cannot be decided on the basis of such faulty, partisan or otherwise discrepant 'data'.</p> <p>I would therefore urge that either (a) a much clearer, tenable and up-to-date review be produced, or (b) no binding decisions be made on so shaky a basis as the present document. I look forward to hearing imminently that my taxes are being deployed towards creating a far more robust and authoritative résumé than the one currently on offer. Rather than groping and lurching through the present fog, how about starting with a frank and tenable decennial update on Oxon's C&I status?</p>

	With every good wish
178	<p>Meanwhile there is a run of paragraphs in Section 4 of the Draft Waste Strategy which appear at best to paint an inconsistent picture of how much waste our area will need to cope with in the future. No recent account is taken of the virtual doubling of local domestic recycling within the past 12 months, nor of the fact that Didcot A's imminent decommissioning will significantly reduce future quantities of C&I; even though elsewhere the report authors reveal that the Didcot A closure in 2015 will cut an estimated 190,000 tpa from this. Even an educated layman such as myself (MA Oxon 1984) can see that these various pseudo-stats and disingenuous fictistics bear worryingly scant tenable relation to current everyday life in the district.</p> <p>I am reminded of the classic recipe for farce (be this of the Feydeau/domestic genre, or the institutional Men-from-the-Ministry type) where a ridiculous number of misassumptions, half-truths etc piles up until it is top heavy and then collapses amid general consternation. But issues of the present type and magnitude surely cannot be decided on the basis of such faulty, partisan or otherwise discrepant 'data'.</p> <p>One is therefore almost inevitably led to wonder where this muddle is going to lead our policymakers; or whether, even, in fact, the sloppy, opaque and contradictory presentation is simply a smokescreen behind which other vested interests are finding room to manoeuvre.</p> <p>It is one matter to couch such an assessment amid prudent caveats, but while the figures are themselves a mixture of the arbitrary, the selective, the risibly out-of-date and the suspiciously partisan, one ends up with a document whose limited credibility and general ramshackle vagueness take it pretty well below the threshold of being fit for purpose. It was presumably the relevant civil-servants' brief to come up with a genuine best-guess proposal based on the strongest available statistics; one which would be convincing within a reasonable margin (what with the current economic downturn etc.). A document which throws up its hands and wails about 'considerable uncertainty' (Para 3.19) and that it is 'difficult to assess' (3.27) a 'largely theoretical ... capacity gap' (6.8) reads like a document that is wittingly fudging the issues, whether from plain incompetence or some other murkier motive. Surely you and we deserve better than this. Then in Para 3.29 we read that there has 'been no other survey work' on Oxon C&I waste for a decade since 2000/1 ! Shades of Rip van Winkel here ... except that sadly this is not just a moral tale for children or philosophers.</p>
200	<p>Policy W1: The amount of waste to be provided for (support)</p> <p>The notion that Oxfordshire should be net self-sufficient in the management of waste is supported. Our client does not dispute the anticipated requirement, in terms of the quantities of waste to be dealt with, across the plan period and supports the underlying principle that there is a need to provide additional facilities within the plan period to</p>

	<p>manage and recycle municipal solid waste, commercial and industrial waste and construction, demolition and excavation (CDE) waste.</p> <p>Our client supports the statement that the figures set out in Table 2 should be "used as a guide to the amount of provision to be made" and that the figure should be kept under review throughout the plan period.</p>
77	<p>Policy W1 - Comment:</p> <p>The presumption that the construction, demolition and excavation waste will return to its pre-recession levels is not supported. It is considered the Plan uses this figure to artificially support the argument that there will be a three fold increase in the availability of recycled materials. Without greater justification for this assumption, noting that the change in volumes of the other waste streams are much more modest (including commercial and industrial which was also affected by the recession) could affect the soundness of this policy and that of the Plan itself.</p>
253	<p>Regarding the main projections, I cannot particularly argue with these. They are probably reasonable if the 40,000 new homes materialise and the economy regains traction. Regarding how the respective volumes break down into separate waste management components does need re-examination however. For example, recycling rates for household waste are assumed to reach 62% by 2020, where in our area rates have already reached 70%. Surely the 62% figure is an under-assessment of what is realistically possible?</p>
POLICY W2: WASTE IMPORTS	
9 Bucks	<p>It would be useful to provide existing arisings of imports from London and other areas for context.</p> <p>Paragraph 4.13 states that there "...should be continuing pressure on authorities in London to make provision for dealing with their own waste". BCC supports the principle of seeking to managing a declining amount of residual waste imported into Oxfordshire, particularly from London and notes that sufficient landfill capacity remains within existing sites. Nevertheless, the plan still applies the apportionment of imports from London set out in Policy W3 of the South East Plan (SEP). In light of Government's advice to take into account the Government's intention to revoke Regional Spatial Strategies, we support the County Council's intention to discuss the apportionment further with the London authorities (paragraph 4.8, 'Waste Need Assessment') and encourage that you review the apportionment for imports from London in order to encourage greater net self-sufficiency in line with the now adopted London Plan.</p> <p>The County Council supports the principle behind Policy W2 but suggest it includes the figure for the provision to be made for imports from London.</p> <p>In addition, in line with other authorities seeking to achieve net self-sufficiency, the Council questions whether provision should be made for imports from elsewhere, particularly as you are seeking to safeguard</p>

	existing landfill capacity for residual non-hazardous waste (paragraph 4.62).
234	It appears that contrary to its own declared policies W1 and W2 that Oxfordshire should be self sufficient in its waste disposal abilities, and that provision should be made for a declining amount of waste from London and elsewhere, other paragraphs and suggested policies seek to increase the ability to take waste from elsewhere. For example, it is stated that Ardley (which the public at large understood was for Oxfordshire waste) might well take waste from Buckinghamshire ! It is totally ludicrous to reduce the capability to process Oxfordshire waste at Ardley by permitting a proportion of Ardley's capability to be squandered on someone else's waste. This is also totally contrary to the aim towards localisation of waste production and waste processing. Furthermore, reference is made to accepting waste from London and/or Berkshire, again contrary to the above mentioned policies.
22	I am also very keen to see that only facilities which have clear benefits for Oxfordshire should be permitted to be built locally, it seems entirely wrong to me that any waste treatment facilities should be built here to treat waste from beyond Oxfordshire.
243 Viridor	<p>Policy W2: Waste imports states that 'Provision will be made for disposal of a declining amount of waste from London and elsewhere at existing landfill sites. Facilities which provide substantially for the treatment of waste from outside Oxfordshire will not be permitted unless there would be clear benefits within Oxfordshire'.</p> <p>This policy is unduly prescriptive and contrary to advice contained within PPS 10. PPS 10 does not include measures to stop waste travelling across local authority boundaries and whilst it advocates self-sufficiency it doesn't seek to create barriers at the boundary of each local authority. PPS 10 seeks to ensure that waste is disposed in one of the nearest appropriate installations - it does not state that waste needs to be disposed within the boundary of the local authority in which it is generated.</p> <p>The policy is also obscure and requires further clarification as it does not identify or clarify what the 'clear benefits' would entail and does not define or quantify the word 'substantially'.</p> <p>This policy as drafted to reduce the ability of waste to be disposed of in one of the nearest appropriate locations and is therefore contrary to the provisions of PPS 10.</p>
48	On a related point, the forward waste projections show not only Oxfordshire's waste estimates (para 4.4., Table 1) but also forecasts of imported waste from outside the county. These totals reveal a combined waste capacity need of 5.55 million tonnes in 2010, and 3.37 and 3.44 million tonnes in 2020 and 2030 respectively. This represents a 38% reduction in overall combined waste volumes over the period. While I applaud Policy W2 - to limit further importation unless there would be clear benefits for Oxfordshire - does the estimated decline in imported volumes not have any impact on the need for future facilities for the

	county? It would be good to see this point reconciled in the draft.
63 Grundon	Imports (W2) Oxfordshire imports some 600,000 tonnes per year predominantly to landfill. It is proposed to reduce these residual waste imports to less than one third of their current levels. These imports are predominantly from London and Berkshire. The RSS contains a policy reducing the level of imports from London across the Region and London is making plans to achieve this. However there is no RSS policy to reduce sub regional transfers nor are we aware of any policy being proposed in Berkshire to achieve a reduction of this scale, added to this Berkshire is rapidly running out of its own landfill space.
122	6. Policy W2 is very welcome but should be expanded to include the essence of paragraph 4.13 plus mention of Berkshire and other areas importing waste into Oxfordshire.
73 Hint W	We consider that Oxfordshire is having to import too much waste for landfill from outside the county. This should be curtailed drastically.
102 SC PC	It is pleasing to note the statement in policy W2 "Facilities which provide substantially for the treatment of waste from outside Oxfordshire will not be permitted unless there would be clear benefits within Oxfordshire". However currently waste is imported from London, so the statement at the moment appears incompatible with welcoming continued input of waste from London. There is an objective to minimise transport and the effect on the environment but that is effectively cancelled by the import policy. Similarly reference is made to transfer stations as transit storage facilities. This has additional transport implications and goes against the County Council objective of minimising transport needs.
105 SODC	We object to this policy on the grounds that it is too vague and too weak and needs to be more robust and specific. The reasons behind the policy at paragraph 4.15 are sound but the policy itself does not go far enough to ensure those reasons will be satisfied and the policy should be changed as follows Provision should be made for declining amounts of waste from all non-hazardous waste streams / for all types of non-hazardous waste. No waste facilities of any type which provide substantially for the disposal, treatment or handling of waste from outside Oxfordshire will be permitted unless there would be clear benefits within Oxfordshire.
113 Vale	We object to this policy on the grounds that it is too vague and too weak and needs to be more robust and specific. The reasons behind the policy at paragraph 4.15 are sound but the policy itself does not go far enough to ensure those reasons will be satisfied and the policy should be changed as follows Provision should be made for declining amounts of waste from all non-hazardous waste streams / for all types of non-hazardous waste. No waste facilities of any type which provide substantially for the disposal, treatment or handling of waste from outside Oxfordshire will be permitted unless there would be clear benefits within Oxfordshire.

78	<p>Policy W2 - Comment:</p> <p>Where waste recycling facilities are located on the boundaries of the County there must be greater recognition that a larger proportion of the waste treated could arise from outside Oxfordshire. As waste arisings do not necessarily reflect administrative boundaries by restricting the policy could adversely impact on the recycling target.</p> <p>The approach to reducing the amount of non-Oxfordshire waste handled within the County is more appropriate for landfill sites but should not be applied to recycling sites. (Note, this could also impact on the level of provision for recycled materials).</p>
134 CPRE	<p>Policy W2: Waste imports</p> <p>We agree with OCC that it would be counter-productive to allow new waste management facilities in Oxfordshire predominantly to treat waste from elsewhere. We believe this would be a dis-incentive to self-sufficiency in other areas and would lead to waste travelling longer distances than necessary, or to provision of waste management capacity in excess of estimated requirements.</p>
153 Alk PC	<p>Policy W2</p> <p>Using tables 2 and 3, the data presented shows that 17.5% of the waste managed in Oxfordshire over the next 20 years will be imported from London and elsewhere for landfill in Oxfordshire. In the next five years that proportion will be over 32%. The figures mean that over 43% of the waste going to landfill in the county over 20 years and that over 50% in the next five years will be imported. We commend the county's efforts to reduce imports.</p> <p>However, the policy is inadequate; it should quantify the amounts that will be accepted by Oxfordshire. This should be based on the other authorities reducing their dependence on landfill in line with Oxfordshire and the quantification should be based on the proportions of municipal, commercial and industrial, and CDE waste going to landfill / restoration as shown under policy W3. Otherwise, there is no incentive for the other authorities to invest in their own facilities.</p>
183 Surrey	<p>However, there is concern about proposed Policy W2. While the first part of the policy about declining provision for disposal of waste from London and elsewhere to landfill in Oxfordshire is supported, the second part of the policy appears very narrowly drawn. It could preclude well-sited facilities that are located near the county boundary where the waste is sourced from mainly outside Oxfordshire. It may also unreasonably preclude specialised waste treatment facilities that would have wider benefits for the South East and neighbouring regions.</p>
194 EA	<p>There should be evidence of cooperation between neighbouring authorities when a particular policy may have an impact on cross-border facilities such as landfill voids or waste streams and movements.</p>
201	<p>Policy W2: Waste Imports (part support; part object)</p> <p>The principle of disposing of a declining amount of waste from outside Oxfordshire at existing landfill sites in the County is supported. Frobisher Renewables Limited also recognises that, in order to</p>

	<p>encourage greater self-sufficiency in other areas, the development of new facilities for the management of waste in Oxfordshire should focus on waste originating within the County.</p> <p>As recognised at paragraph 4.12 of the Waste Consultation document however, there are large towns in neighbouring counties (e.g. Reading in Berkshire and Swindon in Wiltshire) which are located close to the administrative boundary of Oxfordshire. Whilst the principle of not transporting waste over unnecessarily long distances is fully supported therefore, the appropriate distance over which waste may be transported should be considered on the basis of a transportation distance radius and not on the basis of the administrative boundary alone. The appropriate transportation distance will also vary dependent on the nature of the waste stream and the nature of the waste management / recycling facility to be provided and this should be recognised in the policy.</p> <p>The development of facilities which are capable of managing or treating some waste from neighbouring areas where the facility is sustainably located, and does not result in waste unnecessarily being transported over long-distances, should be supported.</p>
<p>232 RSRL</p>	<p>1. Research Sites Restoration Ltd (RSRL) welcomes the opportunity to submit representations in respect of the Oxfordshire Draft Waste Planning Strategy. Our comments begin with an overview of our business and current operations. They then describe the relevance of the draft Waste Plan to RSRL's operations before focusing on our objection to draft Policy W9 - Radioactive Waste. This sets out the reasons why we believe that the policy should be changed and concludes with our proposed change to the policy. For reasons of consistency, if the County Council accept our position with regard to draft Policy W9 then similar changes should be made to draft Policy W2 - Waste Imports.</p> <p>[For full representations see ID233 – W9]</p> <p>66. For consistency Policy W2 should also be amended as follows:</p> <p>'Provision will be made for disposal of a declining amount of waste from London and elsewhere at existing landfill sites. Facilities which provide substantially for the treatment of waste from outside Oxfordshire will not be permitted unless there would be clear economic or environmental benefits and the proposals are in accordance with the relevant national strategy.</p>
<p>57 Agrivert</p>	<p>Support policy W2. The principle of providing "clear benefits" outlined in the policy should be more prescriptive, however. Treatment facilities may provide a range of renewable energy benefits, for example, that are not measurable in terms of their impact on Oxfordshire (such as electricity generation). Nonetheless there are clear benefits to their operation.</p>
<p>230 W Berk</p>	<p>Thank you for consulting West Berkshire Council in respect of your current Draft Oxfordshire Minerals and Waste Plans. We appreciate</p>

	<p>being consulted and would like to be kept informed of the development of these plans.</p> <p>With respect to the waste plan we welcome the acknowledgement that residual waste will continue to be exported from Berkshire to Oxfordshire for disposal, and we agree that the volumes of such waste will decline over the proposed plan period as new facilities are developed. As you acknowledge West Berkshire is in the position whereby we no longer have any active non hazardous landfill sites and, due to the geology of West Berkshire, new minerals sites are unlikely to result in additional capacity being provided.</p>
<p>POLICY W3: WASTE MANAGEMENT TARGETS</p>	
<p>10 Bucks</p>	<p>Paragraph 4.21 states that the strategy assumes that from 2015 the EfW facility at Ardley will be operational and paragraph 4.43 states some 200,000 tonnes of C&I waste provision will still need to be identified, but it is not certain how deliverable this strategy is, or when this capacity will become available over the Plan period. It is assumed 2% of Oxfordshire's MSW and C&I waste will be sent to landfill from 2015 onwards. We would therefore question whether the strategy is flexible to accommodate residual waste capacity which is not sent to Ardley, or if Ardley, for whatever reason, does not become operational by 2015 or if the remaining C&I capacity does not come forward as early as 2015. It would be useful to demonstrate whether Oxfordshire has suitable landfill capacity if only the minimum (target) amount of residual waste is diverted over the Plan period. It is not clear from the supporting 'Waste Need Assessment' why it is certain that only 2% of waste will only be sent to landfill.</p> <p>At the advisory meeting with the Planning Inspector, it was recommended that we should consider the implications if the preferred strategy, for whatever reason, could not be delivered i.e. a contingent scenario or capacity, emphasising that although the contingency might not be the most appropriate, it should be deliverable.</p>
<p>31 Didcot</p>	<p>Table 2 shows MSW recycling and composting increasing from 170,000 tonnes in 2010 to 200,000 tonnes in 2015. 4.20 says that a recycling/composting rate of 62% "should be achievable by 2020" and policy W23 gives a recycling/composting rate of 61% in 2015 rising to 62% in 2030. Since recycling rates have already reached 70% in South Oxfordshire and Vale of White Horse Districts, the anticipated composting and recycling rates seem too low. We also question the assumption in 2.26 that the review of the Joint Municipal Waste Management Strategy "is not expected to raise significant planning issues" since there has clearly already been a radical change in the recycling rate.</p> <p>Also in Table 2, the CDE recycling forecast is 650,000 tonnes in 2015 and 780,000 tonnes in 2030. However, Policy M1 in the Minerals Strategy says that provision will be made for facilities "to enable the supply of at least 0.9 million tonnes of secondary and recycled aggregates a year" ... "primarily through recycling of construction,</p>

	demolition and excavation waste". Are the anticipated recycling rates therefore too low?
249	The levels of waste generated locally seem to be overestimated, taking little account of the fact that recycling in the Vale, for example, has already risen from 36% to 70% since October 2010; whereas the document mentions only 62% across the county by 2020.
250	Recycling has risen tremendously in the Vale and with the closure of Didcot A power station industrial waste will fall.
46	<p>Regarding the main projections, I cannot particularly argue with these. They are probably reasonable if the 40,000 new homes materialise and the economy regains traction. Regarding how the respective volumes break down into separate waste management components does need re-examination however. For example, recycling rates for household waste are assumed to reach 62% by 2020, where in our area rates have already reached 70%. Surely the 62% figure is an under-assessment of what is realistically possible?</p> <p>Equally, C&I recycling rates are deemed to be 'appropriate'. It would be helpful to know this precise figure and why this is 'appropriate' for Oxfordshire. Is this the 38% recycling level achieved in 2000/1, compared to the 50% of C&I waste that DEFRA suggests is now being recycled nationally?</p>
64 Grundon	<p>Recovery (W3)</p> <p>The Plan seeks to divert all waste from landfill leaving only 2% residual MSW and C&I waste to landfill.</p> <p>There is no clear guidance as to how such figures have been derived and seem to run counter to other evidence. Of particular concern is that relating to C&I waste. The Urban Mines study of C&I arisings in the North West in 2009 found that 78% of waste to landfill was suitable for recovery and that a further 8% may be suitable. An investigation of the EA's WDI by waste code would have verified the amount suitable for recovery. We have undertaken a similar assessment within an adjacent authority and found that 26% would likely to be unsuitable for recovery.</p>
123	7. Policy W3. The percentages used in the Policy demonstrate just how much the strategy underestimates the recycling rate, which currently is just short of 70% of MSW in the Vale and SODC, whereas the policy table estimates that that level will not even be reached by 2030.
101 SC PC	In point 4.23 recycling targets remain constant between 2015 - 2030 at 31%, yet the Vale of White Horse District Council between October 2010 and September 2011 recycled 69.85% of collections. No account has been taken of increased recycling rates. Where have the figures for waste management targets originated?
106 SODC	These policies are supported.
114 Vale	These policies are supported.
129	The draft strategy assumes that current levels of recycling for C&I

	<p>waste are 'appropriate', but what are these? The document does not clarify this. If it's anything less than DEFRA's estimate of 50% of C&I waste being recycled nationally, we need to know this and why this lower level is deemed 'appropriate'. Please clarify!</p> <p>On a similar line, why are recycling rates of 62% of household waste deemed acceptable by the year 2020, when some areas of the county are achieving close to 70% recycling rates. This is not explained.</p>
135 CPRE	<p>Policy W3: Waste management targets</p> <p>We note in Policy W3 that the target for the recycling of household waste by 2020 is set at 62%. While we recognise that the county already has one of the best overall recycling rates nationally, we believe that Oxfordshire should lead the way on this issue and set the target at no less than 70%. We are also concerned at the variation in recycling rates within the County, noting in particular that Oxford City District is achieving a recycling rate of only 40%. We would like to see all Districts achieving a recycling rate of no less than 70%.</p>
172 Ox City	<p>The higher target for municipal waste recycling (as referred to in paragraph 4.20) is supported. The target to reflect a significant drop in municipal, commercial and industrial waste to 2% by 2015 (paragraph 4.21) is also fully supported.</p>
193 EA	<p>We welcome mention of the Waste Hierarchy and the tables demonstrating the likely impact on the direction of travel for different waste forms across the plan period. The Annual Monitoring Report will be important in reviewing performance against the intended targets which are set out, particularly as quite ambitious reductions in landfill are indicated. (50% - 2% by 2015. The plan should elaborate more also on what treatment of residual waste you are expecting to be brought forward in the county, at present this seems to be through the use of Ardley. We would not wish Ardley to prevent the movement of waste further up the hierarchy and so the provision of facilities to promote recycling and preparation for reuse should be prioritised over incineration. The Waste Strategy Review contains more information in this respect.</p>
79	<p>Policy W3 - Comment:</p> <p>The concern is repeated regarding the reliance on the amount of construction, demolition and excavation waste that can be recycled for use in the construction sector. Much of the waste arising is unsuitable for re-use comprising soft clay, sandy clays etc. The nature of this waste stream needs to be better understood and researched as currently the view is that we are at maximum recovery from this material.</p>
70 Agrivert	<p>The targets for composting & food waste treatment (particularly in respect of commercial & industrial wastes) may not be ambitious enough given the anticipation of a ban on all biodegradable waste sent to landfill by 2020 in a revision to the EC Landfill Directive.</p>
POLICY W4: CAPACITY GAP	
19	<p>I write on behalf of Summerlease Ltd in response to the MWDF Draft Waste Core Strategy. The company has nominated a site at Dewars Farm, Ardley for consideration as an Anaerobic Digestion (AD) facility</p>

	<p>principally for processing food waste from the commercial and industrial sectors (letters dated 12/2/2008 and 26/1/2009). Notwithstanding the development of other AD facilities in Oxfordshire, the Dewars Farm project is still active and being promoted through the MWDF process.</p> <p>In Policies W1 - W4 the need for additional waste capacity is considered. AD is not specifically listed, but is presumed to fall under the 'composting' heading. The conclusion appears to be that existing facilities are adequate and no additional provision is required. It therefore follows that new sites will not be considered in the Site Allocations Plan.</p> <p>Summerleaze Ltd disagree with this analysis for two reasons:</p> <ol style="list-style-type: none"> 1. They consider there is a need for additional capacity for commercial and industrial composting above the 30,000 tonnes capacity shown from 2015 (table 2). The proposed site is near the County boundary and the natural catchment area extends into adjoining authorities. Under the new National Planning Framework there will be a duty for neighbouring authorities to co-operate and consideration of cross boundary movements is necessary 2. Limiting provision to existing and permitted sites is anti-competitive and will have the effect of creating monopoly provision that can only have an adverse effect on the fees paid by Local Authorities and the commercial sector for the disposal of food waste. <p>Could you please acknowledge receipt of this response and get in touch if any point is not clear or you need further information.</p>
251	<p>On a related point, the forward waste projections show not only Oxfordshire's waste estimates (para 4.4., Table 1) but also forecasts of imported waste from outside the county. These totals reveal a combined waste capacity need of 5.55 million tonnes in 2010, and 3.37 and 3.44 million tonnes in 2020 and 2030 respectively. This represents a 38% reduction in overall combined waste volumes over the period. While I applaud Policy W2 - to limit further importation unless there would be clear benefits for Oxfordshire - does the estimated decline in imported volumes not have any impact on the need for future facilities for the county? It would be good to see this point reconciled in the draft.</p>
235	<p>These references seem to be at total odds with the opinions of the Planning committee who very wisely threw out the Incinerator and MBT plans for Sutton Courtenay, and yet the draft needs assessment seems to seek to make it easier for developments that would encourage enormous waste processing centres which would be excessively big for Oxfordshire and would encourage import ting waste from outside the county to what purpose?</p>
32	<p>4.12 is about the movement of waste across the county boundary. The rate of import from London is declining (4.14) and the expectation is that Oxfordshire will be net self sufficient (4.8). It is assumed (probably</p>

	<p>correctly) that the Ardley facility will import 90,000 tonnes per annum from outside Oxfordshire (4.43). The strategy should therefore assume that 90,000 tonnes is also exported to ensure that there is net self sufficiency but it does not do so.</p> <p>Taking all of the above into account, we dispute the suggestion (4.45) that a large facility for treating residual C&I waste may be needed in the Abingdon / Didcot / Wantage & Grove area. The facility proposed in 4.47 is too large.</p>
44	<p>To begin at the beginning....the forward projections for the types of waste to be managed within the county through to 2030, separating these out by composting, recycling, residual treatment, landfill and C, D & E waste, are reasonably clear. However, what is lacking is any proper listing of all the existing sites, and sites with planning permission for new provision in the county, separating out their particular function/s as a waste management site (i.e. composting, recycling, landfill, or mix of these etc), and their function capacities going forward, in a way that can be compared and matched against the overall forward waste projections for the county. If this was clearly mapped out, I would understand the rationale for new provision much more clearly.</p>
65	<p>Capacity (W4)</p> <p>The plan details overall capacities of recycling and transfer facilities however these fulfill very different functions and should not be considered together. Whilst there may be some overlap these operations should be listed separately. Full details of capacities should also be detailed for the sake of transparency and to verify the conclusions of the Plan.</p> <p>The capacity quoted for C&I recycling places great reliance upon a small number of large MRF's which have not been built and may not be and the capacity will need regular review.</p> <p>The position on landfill capacity and requirement requires review in light of our comments on policies W2 and W3.</p>
124	<p>8. Policy W4. Paragraph 4.25 acknowledges that there are "uncertainties in estimating future waste levels" and then goes on to add a further 10% flexibility, without acknowledging the recent evidence of recycling rates being much higher. On that basis the policy makes estimates on additional capacity requirements which are difficult to check against known capacity, but show a considerable decline after 2015, which is not allowed for in the proposed shortfall provision.</p>
99 SC PC	<p>The figures should be amended to include the additional capacity of these already permitted developments. The documentation therefore appears to include scope for over-capacity. This is a commercial and not a community consideration.</p> <p>Information as to baselines has not been provided therefore references to percentage contingencies, or growth projection are meaningless. It is</p>

	<p>impossible to understand how a shortfall in waste treatment provision has been identified or justified. The proposed draft waste strategy is therefore based on a defective needs assessment, so that too is discredited and cannot be correct.</p> <p>Inaccurate and non detailed provisions in the draft will lead to unintended consequences. It is stated that a degree of flexibility needs to be built into assessments of future waste but how can uncertainties and flexibility lead to sustainable plans?</p>
107 SODC	These policies are supported.
115 Vale	These policies are supported.
215 Con Rec	<p>Policy W4</p> <p>2. It is not at all clear how the additional capacity figures for C, D & E waste in Policy W4: Provision of additional waste management capacity have been arrived at. This must, however, be evident in the plan or in the evidence base for it to be considered sound. For example, for each milestone year, it should be clear how much capacity (on the basis of existing figures) would be available and how much additional capacity is required to make up the shortfall. Table 24 at page 65 of the Waste Needs Assessment May 2011 provides such a setting out of the capacity requirement, but this does not at all correlate to the figures given in Policy W4.</p> <p>3. The OWCS identifies at paragraph 4.25 that the provision being planned for is the waste management targets of the predicted waste arising figure + 10%. The waste arising figure identified at policy W1 is 1.3 million tonnes per annum (mtpa), so for capacity purposes would be 1.43 mtpa. The C, D & E recycling target figures are identified at policy W3 as 50% by 2015, and 60% by 2020 until the end of the plan period. Therefore 715,000 tonnes of capacity is required by 2015, followed by 860,000 tonnes thereafter.</p> <p>4. Policy W4 states that no new capacity is required until 2020, when 80,000 tpa is to be provided for, then 390,000 tpa by 2025 and 500,000 tpa at the end of the plan period.</p> <p>5. The Waste Needs Assessment provides at Table 10/7 the individual recycling sites and a number of different total figures, none of which clarify how these assumptions are arrived at. A current total capacity of 1,095,000 tonnes per annum is given based on "Operational" (583,500 tpa), "Non-Operational" (30,000 tpa) and "Committed" (485,500 tpa) capacities. Although not stated it is apparent from our knowledge of the sector that "Committed" relates to facilities that have been granted planning permission, but which have not yet been implemented.</p> <p>6. Sub-totals are given for the first two categories of sites which split</p>

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Table 1: C, D & E Waste Recycling Operational/Non-Operational Site Capacities

Facility Name Recycling Capacity tpa Life

001 Shipton Hill, Fulbrook 7,000 Perm
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004(ii) Slape Hill Quarry, Glympton 55,000 2014

005(ii) Playhatch Quarry 65,000 Perm
 008(ii) New Wintles Farm, Eynsham 110,000 Perm
 009(iii) Worton Farm, Cassington 48,000 Perm
 013(iii) Ewelme No 2 20,000 2016
 028 A(ii)Gill Mill Quarry, Ducklington 27,000 2020
 103 Lakeside, Standlake (non?op) 25,000 Perm
 118(ii) Tubney Wood, Tubney 8,000 2011
 121(i) Old Brickworks Farm, Bletchingdon 40,000 2017
 133(ii) Milton Road, Bloxham 20,000 Perm
 142(ii) Sandfields Farm, Over Norton 4,000 Perm
 145 Ferris Hill Farm, Hook Norton 4,000 Perm
 184 Rumbold's Pit, Ewelme 3,000 Perm
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 257 Hardwick3 15,000 Unauth
 260 Burford Quarry4 3,000 2024
 Total 539,000

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 2 Identified as unauthorised in Table 10/7 but permission for 15,000 tpa until 2019
 3 There is no information available on this site, but in light of "Unauthorised Sub?Total" of 15,000 tpa given in Table 10/7, all of this quantity has been assigned to this site.
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Statement of Common Ground table. Hence the footnotes to that table identifying the sites where wastes other than C&D are included in the figures. There may be other sites in Table 10/7 where the appropriate disaggregation has not occurred.

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Operational/Non-Operational sites figure. These are:

- Dix Pit 236(ii) which is not a recycling, but a site restoration operation;
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small scale facility the maximum quantity of 20,000 tpa for this scale is given.

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17. The total capacity figure in Table 2 is some 129,500 tonnes lower than the capacity given in the Waste Needs Assessment for "Committed" sites. This could quite easily be accounted for by an element of double counting, i.e. not taking into account that new facilities are planned to replace existing ones.

18. As a result, however, it means that actual potential total capacities and required shortfalls at the milestone years would be as shown in Table 3 below:

Table 3: C, D & E Waste Recycling Total Capacities Compared with Policy W3 Targets (tpa)

	2015	2020	2025	2030
Capacity	855,000	780,000	594,000	496,000
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Difference	+140,000	?80,000	?266,000	?364,000

19. Whilst some of the shortfalls work out lower than given in Policy W4, there is a further factor that should be a part of the calculation, which does not appear to have been taken into account. This is that the recycling targets would not be met by providing for sites with total capacities at a rate equivalent to the target requirement, because it is very unlikely that all of these facilities will for various reasons at any given time be operating at full capacity.

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	<p>waste and with steady access to the source of the material. Many of the sites only rely on attracting the material in and do not have the necessary expertise to realise its full potential.</p> <p>22. If the available capacity figures are reduced accordingly by 30% (to reflect actual levels of recycling), the position would be as set out in Table 4 below (rounded figures):</p> <p>Table 4: C, D & E Waste Recycling Total Capacities Required to Achieve Policy W3 Targets (tpa)</p> <table border="1"> <thead> <tr> <th></th> <th>2015</th> <th>2020</th> <th>2025</th> <th>2030</th> </tr> </thead> <tbody> <tr> <td>Capacity</td> <td>600,000</td> <td>550,000</td> <td>420,000</td> <td>350,000</td> </tr> <tr> <td>Target</td> <td>715,000</td> <td>860,000</td> <td>860,000</td> <td>860,000</td> </tr> <tr> <td>Requirement</td> <td>115,000</td> <td>310,000</td> <td>440,000</td> <td>510,000</td> </tr> </tbody> </table> <p>23. Consideration of actual recycling levels is very important, also to meet the requirements of Policy M1 of the Oxfordshire Minerals Strategy Draft (OMS) which aims to make provision for facilities to enable the supply of at least 0.9 million tonnes a year of secondary and recycled aggregate. It quite properly does not provide for facilities with the potential capacity to recycle that amount, but which will actually achieve that level. This supply will almost entirely need to be met from C, D & E waste. Of the other materials identified at paragraph 4.3 of the OMCS road ballast and spent railway ballast are accounted for within the site capacities identified above, and ash from Didcot power station will no longer be produced after 2015.</p> <p>24. In light of this position the minimum shortfall in C, D & E waste recycling capacity would be as set out in Table 5 below:</p> <p>Table 5: C, D & E Waste Recycling Total Capacities Required to Achieve Recycled Aggregate Supply ? OMCS Policy M1 (tpa)</p> <table border="1"> <thead> <tr> <th></th> <th>2015</th> <th>2020</th> <th>2025</th> <th>2030</th> </tr> </thead> <tbody> <tr> <td>Capacity</td> <td>600,000</td> <td>550,000</td> <td>420,000</td> <td>350,000</td> </tr> <tr> <td>Target</td> <td>900,000</td> <td>900,000</td> <td>900,000</td> <td>900,000</td> </tr> <tr> <td>Requirement</td> <td>300,000</td> <td>350,000</td> <td>480,000</td> <td>550,000</td> </tr> </tbody> </table>		2015	2020	2025	2030	Capacity	600,000	550,000	420,000	350,000	Target	715,000	860,000	860,000	860,000	Requirement	115,000	310,000	440,000	510,000		2015	2020	2025	2030	Capacity	600,000	550,000	420,000	350,000	Target	900,000	900,000	900,000	900,000	Requirement	300,000	350,000	480,000	550,000
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	<p>2015 2020 2025 2030 Capacity 600,000 550,000 420,000 350,000 Target 715,000 860,000 860,000 860,000 Requirement 115,000 310,000 440,000 510,000</p> <p>23. Consideration of actual recycling levels is very important, also to meet the requirements of Policy M1 of the Oxfordshire Minerals Strategy Draft (OMS) which aims to make provision for facilities to enable the supply of at least 0.9 million tonnes a year of secondary and recycled aggregate. It quite properly does not provide for facilities with the potential capacity to recycle that amount, but which will actually achieve that level. This supply will almost entirely need to be met from C, D & E waste. Of the other materials identified at paragraph 4.3 of the OMCS road ballast and spent railway ballast are accounted for within the site capacities identified above, and ash from Didcot power station will no longer be produced after 2015.</p> <p>24. In light of this position the minimum shortfall in C, D & E waste recycling capacity would be as set out in Table 5 below:</p> <p>Table 5: C, D & E Waste Recycling Total Capacities Required to Achieve Recycled Aggregate Supply ? OMCS Policy M1 (tpa)</p> <p>2015 2020 2025 2030 Capacity 600,000 550,000 420,000 350,000 Target 900,000 900,000 900,000 900,000 Requirement 300,000 350,000 480,000 550,000</p>
OPTIONS FOR LOCATION OF WASTE FACILITIES	
252	<p>It appears that contrary to its own declared policies W1 and W2 that Oxfordshire should be self sufficient in its waste disposal abilities, and that provision should be made for a declining amount of waste from London and elsewhere, other paragraphs and suggested policies seek to increase the ability to take waste from elsewhere. For example, it is stated that Ardley (which the public at large understood was for Oxfordshire waste) might well take waste from Buckinghamshire ! It is totally ludicrous to reduce the capability to process Oxfordshire waste at Ardley by permitting a proportion of Ardley's capability to be squandered on someone else's waste. This is also totally contrary to the aim towards localisation of waste production and waste processing. Furthermore, reference is made to accepting waste from London and/or Berkshire, again contrary to the above mentioned policies.</p>
254	<p>4.12 is about the movement of waste across the county boundary. The rate of import from London is declining (4.14) and the expectation is that Oxfordshire will be net self sufficient (4.8). It is assumed (probably correctly) that the Ardley facility will import 90,000 tonnes per annum from outside Oxfordshire (4.43). The strategy should therefore assume that 90,000 tonnes is also exported to ensure that there is net self sufficiency but it does not do so.</p>
238	<p>There are further very contentious items in the waste processing</p>

	<p>proposal documents. For example in the associated document CA10 Appendix to the Draft Waste planning Strategy, it shows two very conflicting figures, fig 4 and fig 5. Each showing supposed 'growth areas' but are totally different , and fig 5 could rightly be accused of being glib and arbitrary. This is especially true of the area shown with vertical violet hatching south of Abingdon. This area seems to obliterate Culham, Sutton Courtenay, Drayton, and Steventon. This map is far to simplistic and arbitrary looking to be of any use. Also, the area near Oxford city which extends into the Green belt must be very simplistic and arbitrary, and hopefully will not in practice indicate where the green belt area will be damaged.</p>
<p>136 CPRE</p>	<p>Policy W4: Provision of additional waste management capacity</p> <p>[Insert by OCC: this comment is wrongly headed Policy W4 as it actually refers to Options for Locations of Waste Facilities]</p> <p>We are in general agreement that waste should be managed as close as possible to the source of arising, enabling a minimisation of transport distances. However, we are not in agreement that there is a need for large, industrial scale facilities on the outskirts of the large towns (eg: Oxford, Banbury, Bicester, Abingdon, Didcot, Wantage, Grove, and Witney). We would prefer to see smaller waste facilities on the outskirts of large, as well as smaller towns.</p> <p>We are also concerned at the proposal to site large waste facilities on the outskirts of Oxford in the Green Belt. While we acknowledge that PPG2 allows for waste facilities to be sited in the Green Belt under exceptional circumstances, we believe all new facilities in the Green Belt should be small in scale (see further comments under Policy W5 and W6).</p>
<p>126</p>	<p>4. Additionally where the Waste Planning Strategy borders on producing an outline plan, such as its recommendations on the areas where plant will be required under Policy W5:</p> <p>a. The logic falls down not just because of the incorrect baseline figures in the Needs Assessment, but because there is no audit trail between the Assessment and some of the figures used in the strategy. For example:</p> <ul style="list-style-type: none"> - The Needs Assessment tables do not included permitted but unbuilt plants, but apparently the Waste Planning Strategy does. - There is no way of cross-checking the figures and indeed the current capacity to validate the estimated capacity gap. - There is particular doubt about the estimated C&I capacity gap, as the level of recycling and the capacity available at Ardley are again underestimated, the capacity at Finmere is not included and there appears to be insufficient allowance for the reduction of waste levels on the closure of Didcot A. <p>b. Additionally the Waste Planning Strategy fails to spell out the advantages and disadvantages of the limited options it puts forward and uses unspecified "initial assessments" in paragraphs 4.41 and 4.46 to recommend policy. The result is that Policy W5 gives the unfortunate impression that the authors are prejudging the issue.</p>

	c. I suggest that the Needs Assessment is rewritten with an improved Executive Summary and put out to public consultation, so an agreed baseline is produced for the subsequent redrafting of the Waste Planning Strategy and a further public consultation on that and the policies it recommends. This should include the current and proposed capacities by site and cross referencing by source to the policies, starting with Policy W1.
130	With the above levels of confusion and lack of clarity, it is hard to follow the majority of conclusions in the draft. They largely appear without any clear basis of argument at all.
157 SEAG	<u>3.3 Waste plan consultation document W5</u> states in 4.48 there is surplus capacity for CDE waste and 4.49 makes no mention of Caversham as a potential site for its disposal. Although not made clear it looks as though open water would be the intended restoration for any gravel digging at the Caversham site. It would seem the best option from the flooding point of view.
POLICY W5: PROVISION OF FACILITIES	
23 Banbry	The Council is aware that the temporary consent for the Alkerton household waste site is due to expire so it is generally supportive of Policy W5 "A household waste recycling centre to serve Banbury" but considers that the consultation would have been far more effective if the document had been site specific. It is understood that specific locations for waste management facilities will be identified in a separate site allocations document and the Council looks forward to being consulted on this. It is also noted that Oxford is the largest source of Waste in the County yet there are few waste facilities located there. The Council feels that there is a need to explore opportunities in the Oxford area for new waste facilities.
16	Policy W5 This provides for the establishment of C&D recycling facilities in landfill and quarry sites and is supported.
18 Eyn PC	Eynsham Parish Council think that the effect of the consultation will have only minimal effects on the Parish, but do ask that the requirement for hauliers transporting waste to net their lorries and cargo is enforced.
237	Bearing in mind the fact that the Planning committee threw out a) the proposal for an incinerator at the Sutton Courtenay Landfill site (Oct 2009,) and b) the proposal for the same site of an MBT (September 2011), the draft plan makes very strange reading.
27 Wroxtn	The concerns of the Parish Council are solely based on the issues regarding the proposed relocation of Alkerton Waste Recycling Centre Consultation. In correspondence with Rebecca Harwood, on 9th August the Parish Council proposed the following: - The status quo should remain - The existing site serves the area you need to cover - The money which is being spent on consultants could be used to improve and modernise the existing site to come into line with new standards

	<p>- The area already suffers from fly-tipping - it is believed this will increase due to the recycling centre being closed, as people will not bother to travel further away to dispose of rubbish</p> <p>- Why mend something if it isn't broken?</p> <p>- This is taxpayers money and this is how we would like it spent</p> <p>Regarding the Waste Plan Consultation, it seems that these proposals are in conflict with HWRC Strategy in that this document states that existing landfill capacity should be retained. Also, additional waste facilities for Banbury have been highlighted; there is no mention of the removal/replacement of the Alkerton site:- Preferred Waste Strategy and Proposed Policies: 12 & 13.</p> <p>It is appreciated that this is a very broad document on Waste Management, and that North Oxfordshire/Banbury area will be affected; however there is very little detail regarding the extent of the changes, particularly regarding the size and nature of future development.</p> <p>The Parish Council is strongly in favour of an options review before this whole project consumes vast amounts of elected members'/officers' time and a disproportionate amount of Council Tax.</p>
33 Didcot	<p>Taking all of the above into account, we dispute the suggestion (4.45) that a large facility for treating residual C&I waste may be needed in the Abingdon / Didcot / Wantage & Grove area. The facility proposed in 4.47 is too large.</p> <p>Figure 2 shows that there are currently a household waste recycling centre, 5 recycling/transfer facilities, 2 non hazardous landfill sites and a composting/treatment facility in the Abingdon/Didcot area. This is the largest concentration of facilities in the county and we do not agree that more facilities are needed.</p> <p>Overall, we disagree with Policy W5. The estimated quantity of waste to be processed is incorrect for the reasons given above.</p> <p>Policy W6 provides that, where there is an overriding need and no prospect of an alternative site, waste management facilities to serve Oxford may be allowed in the Green Belt. Such facilities, if provided, should be near to Oxford: Oxford is the largest source of waste in the county (4.57) and few facilities are located there.</p>
26	<p>I don't think the strategy takes into consideration the interests of local people. These recommendations are likely to be damaging to them.</p>
239	<p>2. Policy W5 recommended the establishment of additional permanent recycling plants for commercial and industrial waste and construction, demolition and excavation waste at or close to Faringdon. The suggestion is that these facilities should be located within 2 km of the built-up area to minimise transport costs. Faringdon Town Council recommends that the distance be increased from 2 kms to 5 kms with a view to creating a suitable site on the road to Stanford in the Vale.</p>

<p>41 GB Net</p>	<p>It is difficult for us to comment further since a Core Strategy is concerned with principles and is only indicative of sites, requiring us to wait for an indication of the precise sites you have in mind for the Sites Allocation document that will follow. But the indications are in Policy W5 that you see a need for an additional recycling plant for construction, demolition and excavation (CDE) waste closer to Oxford. In connection with plants of this kind we have recently commented on an application for aggregate recycling at Shipton Quarry. We had reservations about the dependence of what was proposed on road transport, but wonder whether this would satisfy your observed need for something close to Oxford., particularly since you appear to recognize that such plants will be most likely to use road transport.</p>
<p>229</p>	<p>We refer to the above and the current consultation on the full draft of the Oxford Waste Plan 2011-2030. As a stakeholder with site interests within West Oxfordshire we welcome the opportunity to comment on the emerging waste plan and wish to make the following comments in respect of the draft plan.</p> <p>Morston Assets supports the draft waste strategy as set out in the full draft of the Oxford Waste Plan 2011-2030. In particular, we support the proposal set out in the draft policy W5 to:</p> <ul style="list-style-type: none"> - locate waste transfer facilities for the treatment of residual municipal waste in the Witney/Carterton area; and - provide additional permanent facilities for construction, demolition and excavation waste in West Oxfordshire in close proximity to locations where new housing growth is proposed (including Witney). <p>Morston Assets are the freehold owner of land at New Close Lane, Witney (appx 2.33 ha), as identified on the attached site location plan. The site has previously been identified as a suitable waste site in the Council's 2007 Issues and Options Consultation and we actively support the allocation of this site for the provision of either strategic waste facilities (in accordance with draft policy W5, as detailed above) or for additional waste management capacity as detailed in draft policy W6.</p> <p>Draft policy W6 (Sites for Waste Management Facilities) states that in providing for additional waste management capacity priority will be given to land that:</p> <ul style="list-style-type: none"> - is already in permanent waste management or industrial use; - is previously developed, derelict or underused; - involves existing agricultural buildings and their curtilages; and - adjoins sewage works or other uses compatible with waste management development. <p>Whilst not currently in waste management use, the land at New Close Lane has a history of waste management uses as a former tip and depot. Furthermore, the site is derelict and currently underused and is located immediately adjacent to Witney Sewage Treatment Works. We therefore consider that this site, with good access to the A40, is</p>

	<p>eminently suitable as a waste allocation site. We trust that our comments will be taken into account in your ongoing formulation of the Council's waste strategy and planning policies up to 2030 and request that we be notified of forthcoming consultation events in due course.</p> <p>We would welcome the opportunity to further discuss site specific waste proposals for the land at New Close Lane as part of the Council's strategic waste planning process. In the meantime, should you require any additional site specific information then please do not hesitate to contact us.</p>
45	<p>If the locations of these respective waste management functions and capacities were also presented by region of the county relative to actual waste generated, I would also appreciate much better where the shortfalls of provision are most likely to occur with regard to the proximity principle. I suggest all these errors of omission are corrected in any final draft document. Otherwise, not only are the conclusions extremely difficult to follow, but they also appear largely unsubstantiated.</p> <p>Given the preceding comments on repeated 'leaky' data sets and assumptions, the recommendation (4.47) to 'make provision for one large plant for treatment and recovery of resources from residual commercial and industrial waste in the Abingdon/Didcot/Wantage & Grove area' carries little weight as it is not clear if the waste will ever be generated to warrant such a facility. Similarly there appears to be a large blind spot in the draft. Having acknowledged the proximity principle and stated that 'Oxford is the largest source of waste in the county, yet there there are few waste facilities located there,' very little consideration is given to overcoming this lack of 'equity' relative to the rest of the county. This makes conclusions elsewhere appear very biased and Oxford's role as a greater contributor to the county's waste management solutions needs to be much more seriously examined.</p>

<p>34 Cholsey</p>	<p>Cholsey Parish Council has no specific comments with regard to the current county waste plan, as none of the current proposals directly affect the Parish, but this may change depending on the outcome of the current proposal for gravel extraction in the village. If this were to go ahead this might alter parts of the current waste strategy in the long term as a site for Construction, Demolition and Excavation waste close to the west of Wallingford might become redundant.</p> <p>Our main concern is how this strategy may develop, given proposals within the mineral strategy. Mineral extraction and waste are intimately linked and the strategies have been linked at the county level. The council has felt that it has not been adequately informed about some of the current proposals in the mineral strategy and that the current public consultation regarding possible gravel extraction has been at very short notice. In the future we hope to be given more advanced notice of county level proposals that are likely to affect the parish.</p>
<p>66</p>	<p>Provision (W5)</p> <p>The provision of additional facilities is very limited and implies that if an area already has a facility a second is not needed and would be contrary to policy. We consider that such an approach to be restrictive and anti competitive in nature. It is up to industry to come forward with sites it considers suitable and viable to meet a need. Policy should give flexibility to enable this.</p>
<p>98 SC PC</p>	<p>There is no indication where this second EfW plant is to be located. Even though there are no proposals for a second EfW plant as far as this Council is aware, it has been included in the analysis.</p> <p>Point 4.32 in the draft strategy proposes provision for a range of additional waste management facilities taking into account the locations of existing and permitted facilities. Sutton Courtenay site is a temporary area to be restored to agriculture. Its current use in only short term.</p> <p>The statement that there is need for a site in South Oxfordshire is not mathematically justified. Any capacity there would be for the benefit of an area extending outside of Oxfordshire. There is no real demonstration of what is needed beyond what the County Council states it needs to import. The whole provision requires reassessment. Unnecessary references to EfW and MBT should be omitted. Such facilities have already been refused planning consent as being in conflict with the Vale of White Horse District Council's Local Plan.</p>
<p>108 SODC</p>	<p>The policy is not supported and should be changed as shown further below.</p> <p>Plant for the treatment and recovery of resources from residual commercial and industrial waste must be of a type that will be financially viable without being dependent on substantial quantities of material imported from outside the county.</p>

	<p>It has not been shown that a second, single large plant in the county, for the treatment and recovery of resources from residual commercial and industrial waste, would be viable without a reliance on substantial quantities of material imported from outside the county.</p> <p>Insufficient investigation has been undertaken into the potential for the approved site for treatment and recovery of resources from residual commercial and industrial waste, at Ardley, to meet the whole needs of the county. It is not accepted that the plant at Ardley should accept waste from outside the county at the expense of being able to accept waste from within it. In addition, if necessary, consideration should be given first to increasing the capacity at Ardley to accept all commercial and industrial waste arising from within the county, before consideration is given to establishing a second site in the county. This will allow for a plant that is more likely to be financially viable in the long term. There should be consultation on the findings of the investigation.</p> <p>Subject to the outcome of the above investigation and consultation, the policy may therefore need to be changed as follows</p> <p>Either, the following clause at bullet point four of the policy should be deleted</p> <p>A plant for treatment of and recovery of resources from residual commercial and industrial waste sourced (which is not recycled) in the Abingdon / Didcot / Wantage & Grove area</p> <p>Or alternatively, the clause at bullet point four of the policy should be changed as follows</p> <p>A plant for treatment and recovery of resources from residual commercial and industrial waste sourced substantially from within Oxfordshire (which is not recycled) in the Abingdon / Didcot / Wantage & Grove area.</p>
116	<p>The policy is not supported and should be changed as shown further below.</p> <p>Plant for the treatment and recovery of resources from residual commercial and industrial waste must be of a type that will be financially viable without being dependent on substantial quantities of material imported from outside the county.</p> <p>It has not been shown that a second, single large plant in the county, for the treatment and recovery of resources from residual commercial and industrial waste, would be viable without a reliance on substantial quantities of material imported from outside the county.</p> <p>Insufficient investigation has been undertaken into the potential for the</p>

	<p>approved site for treatment and recovery of resources from residual commercial and industrial waste, at Ardley, to meet the whole needs of the county. It is not accepted that the plant at Ardley should accept waste from outside the county at the expense of being able to accept waste from within it. In addition, if necessary, consideration should be given first to increasing the capacity at Ardley to accept all commercial and industrial waste arising from within the county, before consideration is given to establishing a second site in the county. This will allow for a plant that is more likely to be financially viable in the long term. There should be consultation on the findings of the investigation.</p> <p>Subject to the outcome of the above investigation and consultation, the policy may therefore need to be changed as follows</p> <p>Either, the following clause at bullet point four of the policy should be deleted</p> <p>A plant for treatment of and recovery of resources from residual commercial and industrial waste sourced (which is not recycled) in the Abingdon / Didcot / Wantage & Grove area</p> <p>Or alternatively, the clause at bullet point four of the policy should be changed as follows</p> <p>A plant for treatment and recovery of resources from residual commercial and industrial waste sourced substantially from within Oxfordshire (which is not recycled) in the Abingdon / Didcot / Wantage & Grove area.</p>
<p>119 BcS PC</p>	<p>Please find below the response to the Waste Plan Consultation 2011 from Brightwell cum Sotwell Parish Council.</p> <p>We note from the Waste Key Diagram that it is apparently intended to create a new CDE waste facility immediately to the West of Wallingford, presumably commencing at some point after 2020 when it is projected that there will be a need for further capacity.</p> <p>Paragraph 4.33 of the Consultation Document suggests that smaller waste facilities might be located up to 2 km from the built up area. If this is intended to mean not more than 2 km it should mean not less than. Furthermore we think it is inappropriate to locate such facilities where the prevailing wind might blow any dust or other noxious materials in the direction of the built up area.</p> <p>A key objective is to locate waste management facilities as closely as possible to the source of the waste. On the basis the SODC Core Strategy currently proposes that substantially all of the projected new housing for Wallingford should have been constructed by 2020 there is on the face of it a timing mismatch between the provision of such a facility and the period when it would be useful and located close to the</p>

	<p>source of the waste. It is unlikely therefore that the proposal will meet the objective. Rather it appears to be driven by the proposed plan for gravel extraction.</p> <p>So accordingly we object to the apparent location of a new CDE Waste Management Facility in an area West or South West of Wallingford.</p>
222	<p>Policy W5 /Paragraphs 4.57 and 6.10</p> <p>25. The statement at paragraph 4.57 that "There is a need to explore whether there are potential opportunities in the Oxford area for new waste facilities....." is inappropriate.</p> <p>26. In the first instance the plan is supposed to provide some certainty about where wastedevelopment should take place. Given that the Strategy has been some seven years in preparation (since the advent of the Planning and Compulsory Purchase Act 2004), there has been ample time to explore the possibilities of the Oxford area to accommodate waste facilities.</p> <p>27. Secondly two rounds of invitations for nominations of sites to be allocated in the plan over that period have not revealed any available sites in Oxford.</p> <p>28. Thirdly searches of alternative sites put forward in support of applications for recycling facilities near to, but not within Oxford, have demonstrated that there is none. These site searches were accepted by the County Council within the last few years in granting permanent permission for the recycling sites at Worton Farm, Cassington (2009) and New Wintles Farm, Eynsham (2010), and also by the planning inspector earlier this year in allowing the appeal against refusal of planning permission for the aggregate recycling facility at Dix Pit (committed facility no 236(iii)).</p> <p>29. For these reasons the words "at or" should be removed from "close to" in the third bullet point of the second part of Policy W5. Paragraph 6.10 states that from preliminary work on site availability the strategy should be capable of being delivered, but there are no available sites in or "at" Oxford, and none likely to be, (as confirmed by attached email dated February 2010 from Oxford City Council on the subject of locating Aggregate recycling facilities in Oxford), so this element of the strategy is not capable of being delivered. PPS10 states in the third bullet point of paragraph 18 that unrealistic assumptions on the prospects for the development of waste management facilities, or of particular sites or areas, should be avoided.</p>
131	<p>With little basis in fact, the proposal for a large plant for recovery of resources from residual C&I waste in the Abingdon/Didcot/Wantage and Grove area seems very premature indeed. Why, when this waste may never materialize, as the background comments suggest? Are the officers listening a little too closely to WRG own proposals for expansion, as suggested by the largely false description given of the</p>

	<p>status of the Sutton Courtenay site in the May Framework document. If the rest of data supplied in the draft is as wayward of reality as this single instance of sloppiness. God help us!</p> <p>On the proximity principle I fail to understand why no plans (should more waste materialize) are seriously recommended for Oxford, when it is clearly admitted that 'Oxford is the largest source of waste in the county, yet there are few waste facilities located here'.</p>
<p>137 CPRE</p>	<p>Policy W5: Provision of additional waste management facilities</p> <p>We have some concerns with Policy W5 as it relates to new facilities at or close to Oxford within the Green Belt. While we acknowledge that PPG2 allows for waste facilities to be sited in the Green Belt under exceptional circumstances, we believe all new facilities in the Green Belt should be small in scale, so as not to affect its amenities.</p> <p>We also have concerns with Policy W5 and its reference to additional permanent recycling plants for commercial and industrial waste at or close to towns in the southern areas of the county, in particular Henley, given its proximity to the Chilterns AONB.</p> <p>We welcome OCC's statement under Policy W6, that: "It is unlikely that waste management facilities larger than 20,000 tonnes per annum throughput will be compatible with a location within an Area of Outstanding Natural Beauty." However, we could only support a new facility within the Chilterns AONB if it was built on a brownfield site as well as being small in scale.</p> <p>We have similar concerns with Policy W5 as it relates to new waste facilities at Wantage and Grove, since these towns border the North Wessex Downs AONB. As such, we could only support a new facility within the North Wessex Downs AONB if it was built on a brownfield site as well as being small in scale.</p>
<p>150 A Vale</p>	<p>Thank you for your letter of the 1st September 2011 regarding the above and the opportunity to comment on the Minerals and Waste Development Plan Document. We would like to make the following comments.</p> <p>Our comments at this stage of the plan preparation concern the Waste document. We are concerned at the identification of Thame and Bicester within the preferred areas of search for new waste management facilities. We would like at this stage to set out our concerns for any potential landscape and transport impacts upon our district if a site were located at either the North side of Thame or East side of Bicester. In proximity to Bicester and Thame we have several landscapes particularly sensitive to new built development and the character and key characteristics of which need to be carefully considered. The two relevant evidence documents - our 2008 Landscape Character Assessment and Areas of Sensitive Landscape studies can be viewed at:</p>

	<p>http://www.aylesburyvaledc.gov.uk/planning-building/planning-policy/avldfframework/avldf-evidence-base/.</p> <p>We ask that the visual and landscape implications of specific proposals are developed jointly with our district if a site is put forward in proximity to our boundary. We would be concerned with the design, layout and mitigation elements of proposals.</p> <p>In terms of transport impacts, we would be concerned for the increased traffic levels on key routes into our district - the A41 from Bicester and the A418 and B4011 from Thame. The former already takes substantial employment-site generated traffic from sites around Bicester, Westcott and towards Aylesbury. The roundabout junction (A418/B4011) north of Thame is at peak times already at capacity and this is without factoring in planned growth in South Oxfordshire. We ask that the transport implications of any sites considered north of Thame are worked up jointly with ourselves and also with Buckinghamshire County Council. We would be interested in junction improvements, road alterations (especially to the A418 or B4011) and any other works that may be needed to increase capacity as a result of road traffic generated by the waste facility.</p> <p>We look forward to hearing further on the progress of both the Minerals and Waste documents at the Pre Submission stage in early 2012.</p>
<p>154 Alk PC</p>	<p>Policies W5 and W6</p> <p>W5 proposes dispersing the additional recycling requirement for CDE waste to temporary, small- or medium-sized facilities (up to 50,000 t per year) located at landfill and quarry sites across the county. W6 proposes temporary waste management facilities will be permitted at active mineral working and landfill sites. We would point out that Alkerton Quarry and the proposed Shenington Quarry are remote from sources of waste such that long transportation distances would be involved in using them.</p> <p>Furthermore, 50,000 t per year could be, on average, ten 20 t lorries per working day. This is clearly not sustainable particularly when added to the proposed lorry movements associated with the minerals extraction sites in the locality (see The Trustees of the Needler D4 Settlement Shenington Quarry ROMP - planning application ref. MW.0121/11). Also, the Alkerton Quarry is currently inactive and its planning status expires in 2014 well before the county's need arises in about 2025. The Shenington Quarry has planning permission but is currently not being worked.</p> <p>We do not consider Alkerton Quarry (SR-37) to be suitable as a recycling aggregate facility due to the noise and dust associated with crushing and similar processes affecting immediately adjoining homes. Also see comments on policy W9 below.</p>
<p>216</p>	<p>Policy W5 /Paragraphs 4.57 and 6.10</p>

	<p>25. The statement at paragraph 4.57 that "There is a need to explore whether there are potential opportunities in the Oxford area for new waste facilities....." is inappropriate.</p> <p>26. In the first instance the plan is supposed to provide some certainty about where waste development should take place. Given that the Strategy has been some seven years in preparation (since the advent of the Planning and Compulsory Purchase Act 2004), there has been ample time to explore the possibilities of the Oxford area to accommodate waste facilities.</p> <p>27. Secondly two rounds of invitations for nominations of sites to be allocated in the plan over that period have not revealed any available sites in Oxford.</p> <p>28. Thirdly searches of alternative sites put forward in support of applications for recycling facilities near to, but not within Oxford, have demonstrated that there is none. These site searches were accepted by the County Council within the last few years in granting permanent permission for the recycling sites at Worton Farm, Cassington (2009) and New Wintles Farm, Eynsham (2010), and also by the planning inspector earlier this year in allowing the appeal against refusal of planning permission for the aggregate recycling facility at Dix Pit (committed facility no 236(iii)).</p> <p>29. For these reasons the words "at or" should be removed from "close to" in the third bullet point of the second part of Policy W5. Paragraph 6.10 states that from preliminary work on site availability the strategy should be capable of being delivered, but there are no available sites in or "at" Oxford, and none likely to be, (as confirmed by attached email dated February 2010 from Oxford City Council on the subject of locating Aggregate recycling facilities in Oxford), so this element of the strategy is not capable of being delivered. PPS10 states in the third bullet point of paragraph 18 that unrealistic assumptions on the prospects for the development of waste management facilities, or of particular sites or areas, should be avoided.</p>
<p>173 Ox City</p>	<p>Objectives (iii) and (iv) seek to manage waste as close as possible to where it arises, minimise the distance waste needs to be transported by road, and take opportunities to locate facilities in or close to the communities they serve. It is considered that the decision to limit the acceptance of household waste to weekends only at Redbridge Household Waste Recycling Centre is in direct conflict with these objectives. The closure will result in some residents of the densely populated South and Southeast Oxford areas having to make a round trip of over 20 miles, on often congested roads, to either the new facility at Kidlington, or the existing Drayton facility.</p> <p>Suggested change: Include in Policy W5 and supporting text a policy aim to retain permanent and fully functioning household waste</p>

	recycling centres as close as possible to major centres of population, including one at Redbridge, Oxford.
186	Lafarge also supports Policies W5 and W6, which relate to the provision of additional waste management facilities and sites for waste management facilities.
191 EA	- Again, it should be clear that the waste delivery policies (W5 etc) are caveated by saying that sites should be brought forward in accordance with development control policies (C1-C8).
197 ChilCB	Policy W5 (provision of additional waste management facilities) seeks the provision of a permanent recycling plant for commercial and industrial waste at or close to Henley and additional facilities for recycling construction, demolition and excavation waste at or close to Wallingford. Though broad locations are supposed to be indentified on the Key Diagram this does not show where such facilities might be located. Based on the severe constraints around both Henley and Wallingford the Board does not see how such facilities could be located without there being detrimental impacts on the Chilterns AONB and its setting and possibly also the North Wessex Downs AONB and its setting in connection with Wallingford.
203	<p>Policy W5: Provision of additional waste management facilities (part support; part object)</p> <p>Our client supports the key objective of managing waste close to the source of it arising whilst also recognising the varying needs of different waste streams. Such an approach should provide flexibility in the distribution of facilities and allow the complex balance of site requirements, planning policy, sustainability and market conditions to be undertaken in determining the location of facilities. Specifically, Frobisher Renewables Limited supports the concept of a dispersed pattern of facilities in relation to larger and smaller towns - in relation to the recycling of commercial and industrial waste and construction, demolition and excavation (CDE) waste - and supports the identification of Faringdon as a town that would be suitable for the provision of additional waste management and recycling facilities within the plan period (paragraphs 4.40, 4.41, 4.42, 4.49, 4.50 and 4.51).</p> <p>Policy W5 acknowledges the need for additional recycling plants for industrial and commercial waste and identifies locations that will be acceptable in principle. The same policy identifies possible locations for permanent plants for recycling of CDE waste. The inclusion of Faringdon within this policy is supported.</p> <p>With regard to municipal waste, the importance of the Ardley energy from waste facility in dealing with residual municipal waste is acknowledged as is the related requirement for additional waste transfer facilities. Given its proximity to the primary „A? route network (the A420) and the fact that it is not constrained by the Area of Outstanding Natural Beauty designation (unlike for example Wantage) or the Green Belt (unlike for example Abingdon) it is considered that Faringdon</p>

	<p>should also be included in the list of possible locations for a waste transfer station under Policy W5 and should be annotated as such on the Waste Key Diagram at Figure 7.</p> <p>As the plan period progresses it is possible that new technologies will make the local collection, processing and treatment of municipal waste more viable and Policy W5 should encourage the provision of smaller scale, more localised energy from waste facilities where it can be determined that such facilities can reduce waste transportation distances and can generate energy which can be used in the local area.</p> <p>Figure 7 on page 43 (the Waste Key Diagram identifies Faringdon as a suitable location for a municipal solid waste (MSW) and commercial and industrial waste (C&I) recycling facility and a new construction, demolition and excavating waste (CDE) facility. This is supported.</p>
W14 Mid Stny	<p>We refer to Policy C7. "Where transportation has to be by road, the distance travelled should be minimised....."</p> <p>We note the proposal to close the Ardley Household Waste Recycling Centre and that Langford Lane, Kidlington is operational (to cover Oxford City). Given the current and proposed level of expansion of Bicester (Kingsmead, Eco-town etc), we believe that there is a pressing need to build a HWRC to service Bicester town/Eco-town if the Waste Plan is to be compliant with Policy C7.</p>
W127	<p>10. Finally I suggest that all the policies are reviewed after amendment to ensure that local communities will not be subjected to unnecessary planning applications on the basis of the wording used.</p>
258 Wdstck TC	<p>At the October Town Council meeting Woodstock Town Council resolved to advise you that:</p> <p>1. It resists the intensification of the Slate Quarry at Glympton,</p>
POLICY W6: SITES FOR FACILITIES	
6 G Hth	<p>Small scale waste sites within the AONB should be limited to 20,000 tonnes per year, and by association vehicles movements should be limited. 20,000 tonnes equates to about 76 tonnes per day, or about 2 x 38 tonne loads. Established use of industrial sites under use B2 should not give consent for waste treatment under this policy, otherwise the Waste Plan is completely invalid, and will result in unlimited waste treatment in inappropriate sites.</p>
11 NW CB	<p>The North Wessex Downs AONB support reference within Policy C6 that only small scale waste management facilities should be considered within the AONBs - and even then consideration will still need to be given as to whether specific sites can be developed whilst maintaining the need to conserve and enhance natural beauty, the primary reason for AONB designation.</p> <p>Of specific reference to the North Wessex Downs AONB, the AONB boundary follows the outer edge of the main settlements of Wantage, Didcot and Wallingford. It should therefore be possible in all these settlements to site any waste management facilities outside the AONB.</p>

	<p>Finally, even if waste management facility sites are found outside the North Wessex Downs AONB, consideration should be given as to what impact on setting of the AONB these sites may have. Particularly large or tall buildings, large waste sites etc can all have a negative impact on the North Wessex Downs AONB even if they are outside its boundary but close enough to affect its setting.</p> <p>The North Wessex Downs AONB unit therefore request that Policy W6 be expanded to include consideration of potential impact of waste management facilities on the setting of the AONBs (see North Wessex Downs AONB Position Statement on Setting January 2011 as attached).</p>
20	<p>I write on behalf of Summerlease Ltd in response to the MWDF Draft Waste Core Strategy. The company has nominated a site at Dewars Farm, Ardley for consideration as an Anaerobic Digestion (AD) facility principally for processing food waste from the commercial and industrial sectors (letters dated 12/2/2008 and 26/1/2009). Notwithstanding the development of other AD facilities in Oxfordshire, the Dewars Farm project is still active and being promoted through the MWDF process.</p> <p>In Policies W1 - W4 the need for additional waste capacity is considered. AD is not specifically listed, but is presumed to fall under the 'composting' heading. The conclusion appears to be that existing facilities are adequate and no additional provision is required. It therefore follows that new sites will not be considered in the Site Allocations Plan.</p> <p>Summerlease Ltd disagree with this analysis for two reasons:</p> <ol style="list-style-type: none"> 1. They consider there is a need for additional capacity for commercial and industrial composting above the 30,000 tonnes capacity shown from 2015 (table 2). The proposed site is near the County boundary and the natural catchment area extends into adjoining authorities. Under the new National Planning Framework there will be a duty for neighbouring authorities to co-operate and consideration of cross boundary movements is necessary 2. Limiting provision to existing and permitted sites is anti-competitive and will have the effect of creating monopoly provision that can only have an adverse effect on the fees paid by Local Authorities and the commercial sector for the disposal of food waste.
39 TWA	<p>Please find enclosed our comments on the Minerals and Waste Plan Consultation Draft. We would specifically like to highlight the need for a sewage treatment policy within the Waste Plan. I trust this will be considered.</p> <p>Our detailed comments are set out below:-</p> <p>General comments</p>

	<p>Thames Water supports the efforts of Oxfordshire to be a more self-sufficient region, this can result in lower disposal costs and a higher percentage of recycled wastes.</p> <p>However it should be noted that sewage treatment drainage areas do not neatly align to local authority areas and are broadly based on topography and river drainage catchments.</p> <p>In terms of self-sufficiency it is often necessary to transfer wastewater and its by-products (sludge) over considerable distances to achieve the required treatment with minimal impact upon the wider environment.</p> <p>This need should be recognised by the County and local authorities, and policies in the Core Strategy aimed at reducing waste transfer must recognise the particular issues faced by sewerage undertakers in providing a drainage service and permit the transfer of sewage and sewage related products, for example sludge, across local boundaries.</p> <p>There is an established network of sewage treatment works within Oxfordshire. Improvements will be required to cater for growth and to treat sewage to tighter treatment standards as required by Government.</p> <p>It should be also noted that STWs can be suitable locations for new facilities to manage domestic and other wastes.</p> <p>Specific comments We welcome the acknowledge of sewage sludge as a form of waste within the draft Waste Plan, and in this regard we welcome the applicability of draft Policy W6 for sewage sludge.</p> <p>Given the importance of sewage treatment to Oxfordshire in meeting growth requirements and environmental requirements, we consider there should be a specific policy in the Core Strategy on sewage treatment.</p> <p>Surrey County Council and the developing London Waste Plans include such a policy.</p> <p>A recommended policy is detailed below:-</p> <p>"Planning permissions will be granted for new waste water and sewage treatment plants, extensions to existing works, or facilities for the co-disposal of sewage with other wastes, where development is needed for Oxfordshire's arisings, or in the case of arisings from elsewhere, the need can not be reasonable be met elsewhere."</p>
40 GB Net	<p>We acknowledge that under very special circumstances it is acceptable to site waste facilities in Green Belts. We therefore welcome the strong statement in Policy W6 which makes it clear that such very special circumstances would have to be demonstrated if a facility were to be allowed in the Oxford Green Belt and that alternative sites will be</p>

	<p>looked at first. We also welcome the statement that any facilities in the Green Belt would have to genuinely serve the needs of Oxford. We do not wish to see facilities established that would draw in waste from further afield and we therefore suggest that you omit the phrase "in the first instance" in paragraph 4.59, ending the sentence at "...serves Oxford". To leave that in is inconsistent with your wish, expressed in Policy W6 to limit a facility to serving Oxford alone.</p>
<p>51 Cot CB</p>	<p>Thank you for inviting the Cotswolds Conservation Board to respond to the above Plan.</p> <p>I can confirm that the Board considers the Plan to be generally sound.</p> <p>However, with respect to policy W6: Sites for waste management facilities, the Board would suggest amending the reference to sites within Areas of Outstanding Natural Beauty to read:</p> <p>"Within Areas of Outstanding Natural Beauty, only waste management facilities of a scale appropriate to their location and to meet local waste needs will be permitted."</p> <p>The Board suggests these changes as the use of the words "small-scale" has proved problematic in other plans where no definition of "small-scale" is provided, and the word "normally" introduces uncertainty into the application of policy.</p> <p>I hope these suggestions are helpful.</p>
<p>52</p>	<p>We write on behalf of our client, Eskmuir Properties Limited ('Eskmuir'), in making representations towards the Waste Plan Consultation 2011 currently being undertaken by Oxfordshire County Council.</p> <p>By way of background, Eskmuir hold an interest in the land adjoining the proposed household and commercial waste recycling centre at Langford Lane, Kidlington (Ref: R3.0167/10) and have been active throughout the consultation process of this application. Eskmuir are therefore keen to make representations upon emerging waste policy within the Oxfordshire County as this may have significant bearing on the site at Langford Lane or any future proposals.</p> <p>The representations which follow are made specifically with regards to 'Policy W6: Sites for waste management facilities' for which we offer broad support of its principles and attempt to address what we see as shortcomings of the current Policy W6 of the Minerals and Waste Local Plan (1996). However, we also believe there is an opportunity to strengthen the policy in order to place greater emphasis upon requiring a more thorough site selection process when determining the most suitable locations for waste and recycling facilities within the county.</p> <p>Planning Policy Statement (PPS) 10: Planning for sustainable waste</p>

	<p>management (March 2011) details several locational criteria for waste and recycling facilities, including taking into account visual intrusion, traffic and access, air emissions, odours, vermin and birds, noise and vibration and potential land use conflict. We suggest that the emerging policy should make stronger reference to the need during the site selection process for a thorough analysis of these criteria when determining the most appropriate location for waste and recycling facilities, particularly as the current policy has been interpreted as giving less weight to the impact upon the Green Belt than it does to brownfield sites which are acceptable in flood risk terms under the criteria of PPS 10. We believe greater regard should be had to requiring a consideration of all sites within suitable Flood Zones, so as not to exclude without due reason potential sites. Waste treatment facilities which do not comprise landfill and do not handle hazardous wastes are specified as 'Less Vulnerable' to flooding within Table D.2 of Planning Policy Statement 25: Development and Flood Risk (March 2010). Table D.3 of PPS 25 then identifies that 'Less Vulnerable' uses are suitable for Flood Zones 1, 2 and 3a.</p> <p>We therefore consider Policy W6 should include specific reference to requiring any site selection process to consider all sites outside of Flood Zone 3b. This is particularly pertinent as we feel the site selection process at Langford Lane has excluded potentially more suitable sites within Flood Zones accepted by PPS 25.</p> <p>We welcome the policy's added emphasis on sites which are brownfield, and would support the strengthening of the wording within the policy in this respect to protect greenfield and green belt sites from such potentially harmful development.</p> <p>To clarify, we broadly support the aims of draft policy W6, however, as we feel that the policy should be strengthened, we are forced to object in this case. This objection can be resolved by revising the policy and the supporting text to highlight the importance of protecting green field and green belt land and requiring that all suitable sites are considered (including those within acceptable flood risk categories) in the site selection process.</p> <p>I trust these representations will be taken into consideration in the progression of the Waste Plan and would appreciate being kept up to date with any future consultation opportunities which may arise in the preparation of the Oxfordshire County Council Waste and Minerals Development Framework.</p>
228 MoD	<p>The MOD should be consulted on any waste applications sites that fall within the aerodrome safeguarding consultation zones to ensure that MOD safeguarding interests are taken into consideration.</p> <p>Please use email address DIO-Safeguarding-Statutory@mod.uk for any future correspondence.</p>

240	<p>Policy W6: Sites for waste management facilities</p> <p>In providing for additional waste management capacity priority will be given to land that:</p> <ul style="list-style-type: none"> - is already in permanent waste management or industrial use; - is previously developed, derelict or underused; - involves existing agricultural buildings and their curtilages; - adjoins sewage works or other uses compatible with waste management development. <p>Viridor broadly supports this policy but suggest that the wording provides greater clarification i.e. do the bullet pint represent a sequential approach or does it merely list the types of site that are suitable?</p>
125	<p>9. Policy W6 suddenly includes the statement that priority for waste sites should be given to "agricultural buildings and their curtilages". This would include a wide number of areas in rural Oxfordshire, is unsubstantiated and should be deleted.</p>
53	<p>Our clients, Inchcape Estates Limited, own land opposite the application site on the south side of Langford Lane, currently occupied by a Mercedes Benz showroom. Our clients recently objected to the planning application made by the County Council for a proposed Household Waste and Commercial Waste Recycling Centre, at a site in the green belt at Langford Lane, Kidlington (planning application No. R3.0167/10) by letters dated 22nd June 2011 and 8th September 2011 (copies enclosed) and by representations made at the committee meeting.</p> <p>As you will note from our letters to the County Council, we consider the resolution to grant permission is unjustified, fundamentally because we do not consider that the applicant has applied national and development plan policies correctly. In addition we contend that the Council's site selection process is flawed, rendering its rejection of alternative sites untenable. Indeed, we have made representations to the Secretary of State by letter dated 29th September (copy attached) requesting that the application be 'called-in' for determination.</p> <p>In preparing these objections, we examined the relevant planning policies, the manner in which the Council interpreted them, and the way in which the site selection process was undertaken, and concluded that there were flaws in this process.</p> <p>We have now been instructed to make representations to your Authority with regard to the Waste Planning Strategy Consultation Draft, and would request that you carefully consider the following.</p> <p>In summary, we consider that the Draft Core Strategy Policy W6: Sites for Waste Management Facilities, which for convenience is copied in full as an appendix to this letter, is not sufficiently robust in dealing with the priorities for site locations; clearly the policy should require a</p>

sequential test. Neither does it make clear the way in which sites should be assessed. In our view, it needs to be far more explicit in emphasising that sites which are in the countryside or the green belt and/or in an AONB, should only be considered as an absolute 'last resort', once all other sites have been considered and rejected. The policy should also set out the site selection criteria in detail.

We therefore make the following formal representations with regard to this policy.

Draft Policy W6: Sites for waste management facilities Representations

In the explanatory paragraphs which precede the policy itself, para. 4.54 states that priority should be given to land which is previously developed, and that green field sites will not normally be appropriate locations unless there is a 'compelling need' and any impact can be mitigated. Para 4.55 states that proposals for sites within or in proximity to Areas of Outstanding Natural Beauty (AONB's) will be considered against relevant and local policies. Paras. 4.58 & 4.59 address sites in the Green Belt. Para 4.58 recognises that 'in most cases' the development of green belt land would be inappropriate, but states that where there is a 'pressing need' for a particular facility that need may constitute a very special circumstance to take into account. Para 4.59 states that where there is a need for a facility to predominantly serve Oxford and there is no reasonable prospect of an alternative location becoming available in the foreseeable future, waste development in the green belt may be considered acceptable.

Annex E of PPS10: Planning for Sustainable Waste Management does not rule out development in the green belt but states that in searching for sites suitable for new or enhanced waste management facilities, waste planning authorities should consider:

..... a broad range of locations including industrial sites, and give priority to the re-use of previously-developed land, and redundant agricultural and forestry buildings and their curtilages.

These priorities are reflected, reasonably, in the wording of the first paragraph (and bullet points) of policy W6, being sites which are already in permanent waste management or industrial use; previously developed, derelict or underused; involve existing agricultural buildings and their curtilages; and adjoin sewage works or other uses compatible with waste management development.

However, thereafter, we consider that the rest of the policy is far too loosely worded and inadequate, and that insufficient protection is afforded to green belt and other undeveloped sites which do not fulfil these criteria. We consider that policy W6 should set out a clear and

objective sequential test. It should state that only where it can be clearly demonstrated that there is an established over-riding need and that there are no suitable sites which fall within the above categories, should development not on such sites be considered, and then in the following priority.

Firstly, sites in the open countryside. Failing that, and only then, when it has been demonstrated that no suitable alternative sites exist, should sites in the green belt be considered, as a 'last resort'. Within the green belt, wherever the site may be, it should be explicitly stated that very special circumstances must be demonstrated.

The draft policy does not state this at present, and in my view, it clearly should. I submit that with regard to development in the green belt, and to reflect national policy in PPG2: Green Belts (which is effectively reiterated in the Draft National Planning Framework), the policy should simply say something along the lines of...

'The provision of waste management facilities in the green belt represents inappropriate development and will not be permitted, except in very special circumstances'.

In my view, it is not necessary or appropriate to state what vsc's might be justify such development i.e the reference to sites 'to serve the needs of Oxford'; such circumstances should be demonstrated individually with respect to each site and proposal. It is sufficient to retain the existing reference thereto in the explanatory paragraphs.

If such an exercise demonstrates that development in the green belt is justified, the policy should then state that a further sequential test should be applied to alternative sites, in accordance with defined selection criteria (see below), to ascertain the most suitable and with the least impact on the green belt.

For sites within AONB's there should be a similar presumption against development for all waste management facilities, and a similar selection process. It is not considered satisfactory to simply state that applications will be considered against relevant national and local policies, without making it explicitly clear which policies are applicable. The policy should also make it clear where sites in an AONB would sit in the hierarchy of priorities, and whether on an equal level with green belts or not.

As stated, we consider that the policy must also emphasise, clearly and unequivocally, that all development proposals should reflect the policies set out in Section 5 of the Plan, and that sites must be assessed against a specific set of site selection criteria at the initial stage, and again should it be necessary to consider countryside/green belt/AONB sites.

	<p>Those site selection criteria should reflect the advice in PPS10: Annex E, and include factors such as:</p> <ul style="list-style-type: none"> · Sustainability · Nature Conservation · Impact upon the landscape · Impact upon the openness of the green belt · Impact upon character of the area · Impact upon the amenities of any local residents or business occupiers · Potential land use conflict Flooding: as para. 5.5 of the CS recognises waste management facilities can take place in areas at risk of flooding, so flood zone 2 sites should be included. Sites could then be scored against their flood risk in line with PPS25 guidance · Accessibility · Traffic · Noise, dust, smells and visual intrusion: these are all relevant planning issues of significance which should be properly considered <p>The policy should explain that each site would be assessed against these (and any other relevant criteria) with scores attributed, to which due weight would be given. For example, a high score would be given to a industrial/pdl site, a low score to a countryside site, and an even lower score to greenbelt/AONB sites.</p> <p>This process will ensure that sites which are actually suitable are not discounted from the site search from the outset, and also that appropriate weighting is given to reflect the fundamental locational priorities set out in the policy, together with all the various other determining factors which should apply.</p> <p>I trust that these comments will be given the most careful consideration and look forward to your response in due course.</p>
87	<p>It is my opinion that it can be demonstrated that the location of waste and or recycling at Shenington and Alkerton will have a significant adverse impact on the local environment and community through any of the following:</p> <ul style="list-style-type: none"> - Noise - Lighting /illumination - Visual intrusion - Vibration - Odour - Dust - Emissions - Contamination - Water quality impacts - Transport impacts - Loss of best and most versatile land

Planning permission should not be granted for this proposal where by reason of the collective impact of different proposals or be reason of a number of impacts for the same development, the proposal has an unacceptable cumulative impact.

Where new waste development is proposed on, or in proximity to an existing waste management site, the cumulative impacts of all developments in the locality must be taken into account and with the agreement of the local community.

Noise

Waste facilities are likely to produce noise from vehicles and heavy machinery, including reversing alarms, as well as from recycling plants and machinery, particularly those managing construction and demolition waste. Noise impacts should be appropriately mitigated to an acceptable level to the community and where necessary informed by a noise assessment by an independent acoustician. Proposals should be designed to minimise noise at source, taking account of layout, landscape/landform, materials and wind direction ,and implement appropriate measures to control noise generated.

Lighting illumination

Waste facilities can produce light pollution, particularly where operations take place at night. Unacceptable levels of light pollution can have an adverse effect on the environment and the quality of life of local communities. Lighting or illumination impacts will need to be controlled to an acceptable level to the community, and an independent lighting assessment undertaken that takes account of problems such as positioning, height, alignment, light intensity and period of use. The Council should use its planning controls at the application stage to minimise any adverse impacts.

Vibration

Vibration is often linked with noise generation. Vibrations can occur from vehicles and heavy machinery as well as from recycling plants, particularly those concerned with construction and demolition waste. Consequently, proposals should aim to mitigate the impact of vibration at the point of source by influencing the site location and the layout of the site. Where necessary suitable controls should be agreed with the local community in advance of obtaining permissions.

Visual intrusion

New waste developments will need to ensure that any visual impacts of the development are not of an unacceptable level to the local community. Visual impact is normally assessed from publicly

accessible viewpoints of the development site. In assessing visual impact, all component parts of the development should be considered e.g the layout and the location of the site, access routes, design of built structures and landforms and ancillary infrastructure such as fences and hedges. Where necessary proposals will need to demonstrate in advance of permission through a suitable assessment that any adverse impacts of the development upon the amenity of local land uses and the general landscapes are acceptable to the local community.

Odour, dust and emissions

Waste management facilities can impact on local air quality through emissions (both from on-site operations and vehicle movements on and off-site), dust and odour. Where necessary proposals will need to demonstrate in advance through a suitable assessment that any such impacts are of an acceptable impact to the local community, The Council should work closely with regulatory partners in the assessment of planning applications (and submitted assessments where necessary) and the imposition of conditions on planning permissions where required.

Waste management facilities can have an impact upon climate change through the production of greenhouse gas emissions, although the impact of certain types of facility can be greater than others. Landfill sites produce large quantities of methane gas that can contribute significantly to climate change. New waste management development should make provisions to reduce greenhouse gas emissions and impacts upon climate change.

Contamination

It is possible for waste management activities to contaminate land and this is an important issue that must be addressed. Proposals for waste management activities that would lead to unacceptable levels of contamination on and off site as part of the operation, restoration or aftercare of that development should not be permitted.

Development should be located in the least susceptible areas and with suitably sized buffer zones around the site where necessary and in advance agreement with the local community. Facilities that store and treat waste can present risks to groundwater where leachate and other polluting substances may leak from storage areas. Situated at the top of a ridge Shenington and Alkerton are not suitable for this development.

Applications may need to be accompanied by an independent land contamination assessment which should include an extended assessment of contamination in line with PPS22. Sufficient advance information should be required to determine the existence or otherwise of contamination, its nature and the risks it may pose and whether these can be satisfactorily reduced to an acceptable level to the local

community.

Water quality impacts

Waste management facilities can have an adverse impact on ground and water quality unless they are appropriately planned, designed and monitored throughout the life of the development. New proposals must take into account existing ground conditions, pollution arising from previous uses and any proposals for land remediation and the potential impact of the development. Proposals for waste management will only be permitted where it can be demonstrated that provision has been made to protect and where appropriate enhance ground and surface water.

Facilities that store and treat waste can present risks to groundwater where leachate and other polluting substances may leak from storage areas. Situated at the top of a ridge Shenington and Alkerton are not suitable for this development.

Transport impacts

Waste management proposals must seek to use alternatives to road transport where feasible. Developers must demonstrate in advance that the proposal facilitates sustainable transportation by:

- Minimising transportation distances
 - Minimising the production of carbon emissions
 - Where the road is the only viable method of transportation, demonstrating in advance and with the agreement of the local community that there is no unacceptable adverse impact on the safety, capacity and use of the highway network
- Shenington and Alkerton are situated at the extreme north of the county and are not in close proximity to the areas of development.

Our roads are:

- Narrow with hidden bends
- less than 4.4m in many places
- unlit
- lack pavements
- lack road markings
- used by horses
- used by families walking their children to primary school
- used by teenagers walking to buses to access secondary school
- used by the disabled
- used by regular and frequent buses to Banbury, Stratford, Kington, Warwick and Leamington

PPS10 states that existing and potential transport infrastructure should be considered to support the sustainable movement of waste with

	<p>alternatives to road transportation (e.g. rail and water) used where practical and beneficial.</p> <p>Loss of best and most versatile agricultural land</p> <p>PPS7 states that where the development of agricultural land is unavoidable proposals should be located on land of lower agricultural land quality (i.e grades 3b-5).</p>
<p>109 SODC</p>	<p>The policy is largely supported except in respect of its approach to the green belt and its approach to temporary facilities.</p> <p>The approach to the green belt is too permissive. To give proper regard to the importance of the green belt, development in the green belt should be a last resort that is arrived at only after all other alternatives have been exhausted. There must be a much stronger emphasis on the City of Oxford looking first to meet its needs on land outside the green belt. The relevant paragraph should be amended as follows</p> <p>Waste management facilities to serve the needs of Oxford will not be permitted in the Green Belt except where it can be shown that very special circumstances exist that outweigh the harm to the Green Belt and any other harm. Very special circumstances will not exist unless it can be shown that there is an established over-riding need and no reasonable prospect of an alternative site becoming available. If permission is granted for facilities within the Green Belt, controls will be imposed to ensure that such facilities only operate for as long as they are required to genuinely serve the waste management needs of Oxford.</p> <p>The approach to temporary facilities should be tightened up to ensure there is no ongoing detrimental legacy after mineral workings or landfill activities have ceased. The policy should be changed to delete the 'on' before 'completion' and replace it with 'before'.</p>
<p>117 Vale</p>	<p>The policy is largely supported except in respect of its approach to the green belt and its approach to temporary facilities.</p> <p>The approach to the green belt is too permissive. To give proper regard to the importance of the green belt, development in the green belt should be a last resort that is arrived at only after all other alternatives have been exhausted. There must be a much stronger emphasis on the City of Oxford looking first to meet its needs on land outside the green belt. The relevant paragraph should be amended as follows</p> <p>Waste management facilities to serve the needs of Oxford will not be permitted in the Green Belt except where it can be shown that very special circumstances exist that outweigh the harm to the Green Belt and any other harm. Very special circumstances will not exist unless it can be shown that there is an established over-riding need and no reasonable prospect of an alternative site becoming available. If permission is granted for facilities within the Green Belt, controls will be imposed to ensure that such facilities only operate for as long as they</p>

	<p>are required to genuinely serve the waste management needs of Oxford.</p> <p>The approach to temporary facilities should be tightened up to ensure there is no ongoing detrimental legacy after mineral workings or landfill activities have ceased. The policy should be changed to delete the 'on' before 'completion' and replace it with 'before'.</p>
80	<p>Policy W6 - Comment:</p> <p>Waste management facilities are generally not a popular neighbour even on industrial and other employment areas. If the recycling/management targets are to be met there should be a greater recognition that there may be suitable sites on green field land, often adjacent or close to industrial areas that are acceptable for this type of activity. Policy as written puts too strong a test in terms of 'overriding need' and should recognise that Greenfield land can be considered based on a sequential approach.</p>
138 CPRE	<p>Policy W6: Sites for waste management facilities</p> <p>CPRE particularly welcomes the commitment in Policy W6 to locating future waste facilities on brownfield sites. We would object strongly to the location of future facilities on greenfield sites.</p> <p>And as mentioned above, we welcome the sentiment expressed by OCC when it states:</p> <p>"It is unlikely that waste management facilities larger than 20,000 tonnes per annum throughput will be compatible with a location within an Area of Outstanding Natural Beauty."</p> <p>However, we would like to see OCC go further in its commitment to protecting AONBs from the potentially adverse impact of new waste facilities and redraft Policy W6 so it says:</p> <p>"Waste management facilities larger than 20,000 tonnes per annum throughput will be incompatible with a location within an Area of Outstanding Natural Beauty."</p> <p>As mentioned above, we have some concerns with Policy W6 as it relates to the Oxford Green Belt. CPRE acknowledges that PPG2 allows for waste facilities to be sited in the Green Belt in very special circumstances. We therefore welcome the strong statement in Policy W6 which makes it clear that such very special circumstances would have to be demonstrated if a facility were to be allowed in the Oxford Green Belt and that alternative sites will be looked at first.</p> <p>We also welcome the statement that any facilities in the Green Belt would have to genuinely serve the needs of Oxford. We do not wish to see facilities established that would draw in waste from further afield and we therefore suggest that you omit the phrase "in the first instance" in paragraph 4.59, ending the sentence at "...serves Oxford". To leave the phrase in seems inconsistent with the intention, expressed in Policy</p>

	<p>W6 to limit a facility to serving Oxford alone.</p> <p>As mentioned above, we also believe that all new waste facilities in the Green Belt should be small in scale, so as not to affect its amenities.</p> <p>Furthermore, while the draft plan recognises the need to take account of a range of environmental issues, we are concerned that the proposals do not adequately recognise the intrusive effects which waste facilities can have upon the local environment and its residents. We are concerned primarily with noise, fumes, smell, traffic and parking provision, all of which are evidence of industrialisation and therefore in principle unacceptable in the Green Belt and harmful to its amenities. We would therefore like the draft Plan to recognise this problem and be clear about how it might be controlled.</p>
<p>155 Alk PC</p>	<p>Policies W5 and W6</p> <p>W5 proposes dispersing the additional recycling requirement for CDE waste to temporary, small- or medium-sized facilities (up to 50,000 t per year) located at landfill and quarry sites across the county. W6 proposes temporary waste management facilities will be permitted at active mineral working and landfill sites. We would point out that Alkerton Quarry and the proposed Shenington Quarry are remote from sources of waste such that long transportation distances would be involved in using them.</p> <p>Furthermore, 50,000 t per year could be, on average, ten 20 t lorries per working day. This is clearly not sustainable particularly when added to the proposed lorry movements associated with the minerals extraction sites in the locality (see The Trustees of the Needler D4 Settlement Shenington Quarry ROMP - planning application ref. MW.0121/11). Also, the Alkerton Quarry is currently inactive and its planning status expires in 2014 well before the county's need arises in about 2025. The Shenington Quarry has planning permission but is currently not being worked.</p> <p>We do not consider Alkerton Quarry (SR-37) to be suitable as a recycling aggregate facility due to the noise and dust associated with crushing and similar processes affecting immediately adjoining homes. Also see comments on policy W9 below.</p>
<p>165 E Hen</p>	<p>Policy W6: Sites for waste management facilities</p> <p>East Hendred Parish Council supports the general aim of managing waste near its source, where possible.</p> <p>We recognise that this means some new facilities are proposed for the Didcot and Wantage and Grove area, as these are expected to be areas of growth. We note that there are no specific locations for us to comment on at this stage. For this reason we find it important to comment on the policy defining how new sites will be selected.</p> <p>Policy W6 states that: "In providing for additional waste management capacity priority will be given to land that:</p>

	<p>- is already in permanent waste management or industrial use; - is previously developed, derelict or underused; - involves existing agricultural buildings and their curtilages; - adjoins sewage works or other uses compatible with waste management development."</p> <p>We support prioritising land that is already in permanent waste management or industrial use, and would like to see this clearly identified as the first choice for future sites.</p> <p>We are concerned that prioritising land that is 'previously developed, derelict or underused' and land that 'involves existing agricultural buildings and their curtilages' is very open ended, so much so that quiet rural and residential sites could be considered priority sites. In our own parish we have a particular concern that a site that offered waste management without planning permission in the past could be considered a site that was 'previously developed'. This would be unacceptable to the Parish Council. We would therefore like to see some tighter rules on the kind of previous development that would suggest a site be considered suitable as a future waste management site; for example previous industrial use.</p> <p>We support the statement in W6 that: "Waste management facilities will not be permitted on green field land unless there is an established over-riding need and it has been demonstrated that there are no more suitable sites available."</p> <p>We would like to see the statement in W6 regarding potential sites within Areas of Outstanding Natural Beauty strengthened as shown here in bold: "Within Areas of Outstanding Natural Beauty, only small-scale waste management facilities to meet local waste needs will normally be permitted, and only where it has been demonstrated that there are no more suitable sites available."</p> <p>We are concerned that new waste management sites could increase pressure on local roads, adding to traffic and making cycling and walking less attractive. We would be particularly concerned if new sites added to already heavy traffic on the A417 road through East Hendred Parish, which is already very difficult for residents to access at peak times. We would like to see policy W6 explicitly consider traffic impacts when new sites are prioritised and selected.</p>
174 Ox City	<p>Paragraph 4.54 currently states that in planning for new waste management sites, priority should be given to land that is previously developed and suitable for employment purposes. It is not accepted that land currently used as, or allocated for, employment are necessarily more suited to accommodating waste management facilities (except perhaps for small facilities serving only the local area, which may have minimal impact). This particularly applies to urban employment sites, sites close to housing, or mixed-use developments or sites.</p>

	<p>Suggested change: Clarify what is meant by 'employment purposes' by amending second sentence of paragraph 4.54: "...Priority should be given to land that is previously developed and suitable for industrial scale employment purposes (this generally excludes current or proposed B1 business uses)."</p>
175 Ox City	<p>Paragraph 4.57 states that there is a need to explore whether there are potential opportunities in the Oxford area for new waste facilities, particularly for recycling commercial and industrial and construction, demolition and excavation wastes.</p> <p>However in paragraphs 4.41 and 4.46 respectively, it is stated that recycling of commercial and industrial waste should preferably be sited close to towns in Northern and Southern Oxfordshire; and that residual treatment should preferably take place in the Abingdon/Didcot/Wantage & Grove area. This is also reflected in Policy W5 (first two bullet points under "For the other main waste types, provision will be made for...")</p> <p>If located to the North of Oxford, a new waste facility would benefit North Oxford businesses and residents. It is emphasised that the City Council will remain opposed to the loss or downgrading of the Redbridge facility, irrespective of any new provision north of Oxford.</p> <p>Suggested change: Check consistency of the paragraphs referred to above. Amend Policy W5 to provide clarity that there remains an ambition to develop a waste recycling facility close to Oxford.</p>
187	<p>Lafarge also supports Policies W5 and W6, which relate to the provision of additional waste management facilities and sites for waste management facilities.</p>
248 EA	<p>The core strategy should promote the fact that waste does not always have to be a bad neighbour and can take place alongside present industrial and commercial development in some instances.</p>
198 ChilCB	<p>9. The Board considers that the reference to sites within AONBs as part of Policy W6 (sites for waste management facilities) should be amended to read: 'Within Areas of Outstanding Natural Beauty and their settings, only small-scale waste management facilities of a scale appropriate to their location and to meet local waste needs will normally be permitted'. The Board suggests these amendments in order to ensure consistency with legislation and national planning policy, because the use of the words 'small-scale' has proved to be problematic on other occasions, particularly where no definition of 'small-scale' is provided, and because the word 'normally' introduces uncertainty into the application of the policy.</p>
204	<p>Policy W6: Sites for waste management facilities (part support, part object)</p> <p>Frobisher Renewables Limited acknowledges the principle of indicating a preference for siting waste management facilities on</p>

	<p>previously developed land as this reflects advice in PPS10 (Planning for Sustainable Waste Management). It is not clear from the wording of the draft policy whether the list of land types is provided in an order of preference or whether each of the proposed land types is equally preferable. We would propose that the precise wording of this policy should be amended to clarify this point. Simply adding the word „or? at the end of each option would give greater clarity.</p> <p>Paragraph 4.54 notes that when specifying locations for waste management facilities "Priority should be given to land that is previously developed and suitable for employment purposes". The Wicklesham Quarry site has been subject to previous development activity (quarrying) and Frobisher note that paragraph 4.54 recognises the appropriateness of siting waste management facilities at active mineral or landfill sites on a temporary basis. Frobisher consider that there are circumstances where the permanent siting of waste management and recycling facilities at mineral sites is also appropriate particularly where such locations would support PPS10 objectives of: managing waste close to where it arises; maximising economic and social benefits; making beneficial use of existing transport infrastructure; and ensuring the restoration of former mineral workings to a "positive land use" (albeit that this may be an alternative use to the form of restoration originally envisaged). Certain mineral extraction sites are subject to constraints on their restoration, for example the geological importance of exposed former mineral workings means that the Wicklesham Quarry site could not be restored to its condition prior to mineral extraction taking place. Such constraints should be recognised and the potential to introduce alternative, economically and socially beneficial restoration proposals acknowledged.</p> <p>The potential suitability of former mineral extraction sites to accommodate permanent new waste management and recycling facilities should be recognised in Policy W6 and the final paragraph of the policy should be amended accordingly.</p>
211 NE	<p>4.60 - Policy W6</p> <p>We suggest the following addition to this policy: 'Within Area's of Outstanding Natural Beauty Proposed facilities must demonstrate how they conserve and enhance the natural beauty of the AONB, and how they contribute to the purpose of the AONB, or they will not be permitted.'</p>
256 Shell PC	<p>[See also longer comments on the Draft Minerals Strategy Consultation]</p> <p>With particular reference to the two quarries to the south east of Faringdon on the A417....</p> <p>...It is further noted that should additional extraction or recycling facilities be considered on either site, not only will there be additional and excess traffic to both sites but again and especially Shellingford Quarry will not comply with the restoration programme now in place.</p>

	<p>There will be further noise pollution to consider.</p> <p>It is therefore requested that neither Bowling Green or Shellingford Quarries are considered for any additional extraction or recycling and that the Council closely monitor the current workings.</p>
POLICY W7 - LANDFILL	
17 Earthlne	This provides for inert landfill to restore quarries and is supported.
28 Wroxtn	There are also concerns regarding 15. Policy W7, as mineral workings are ongoing in the close vicinity of Wroxton. As this rural village is otherwise surrounded by farmland, it is deemed extremely important that these sites should be restored to their natural state.
241 Viridor	Viridor broadly supports this policy
58	<p>Final Disposal of Waste - Landfill</p> <p>I am concerned that there is no reference to the beneficial use of inert waste that is incapable of recycling, other than for the restoration of mineral workings. I would suggest using in the Core Strategy a paragraph as used in Northamptonshire County Council's Waste Core Strategy:</p> <p>The expectation is that disposal of inert fill will normally be at currently worked mineral extraction sites, where the material can be used as much needed restoration material. As at 1 January 2009 there was broadly 3.53 million tonnes of material required to restore sites currently worked or with a planning permission (granted or agreed), and therefore it is important that alternative proposals for the disposal of inert fill that would prejudice such restoration are not permitted. Alternative beneficial uses for the disposal of inert waste, for example land reclamation, may be acceptable if it can be clearly demonstrated that these would not prejudice the restoration of mineral sites.</p> <p>And a Policy statement as follows: Provision for inert waste disposal should be made at mineral extraction sites requiring restoration, unless it can be clearly demonstrated that an alternative location would not prejudice the restoration of these sites.</p> <p>This will then provide an opportunity in subsequent documents to provide for the use of inert waste for projects such as agricultural improvement and agricultural and other construction work. The approach set out in Northamptonshire County Council's Control and Management of Development is recommended in this respect.</p>
67 Grundn	There is no landfill policy to cover non hazardous or hazardous waste, we see this a serious omission. The need for landfill needs to be reassessed in the light of our earlier comments.
139 CPRE	CPRE agrees that "Priority should be given to the use of inert waste to restore mineral workings".

<p>156 Alk PC</p>	<p>Policy W7 This says existing non-hazardous landfill capacity will be safeguarded for the disposal of residual non-hazardous waste. However, policy W10 says that only permanent waste management sites will be safeguarded. Please confirm that the policy W7 statement refers to permanent sites only and that Alkerton Landfill and Civic Amenity is excluded because it is temporary.</p>
<p>168 RSPB</p>	<p>The RSPB welcomes and supports references in this Policy for the priority use of inert fill in the restoration of mineral workings and the cross reference that the Policy makes to Policy M6 within the Minerals Planning Strategy document.</p> <p>Please see our comments on Policy M6 (below) within the Minerals Planning Strategy where we believe that cross-referencing between the two policy would be advantageous.</p> <p>We welcome and strongly support references in this Policy (M6) for the requirement to achieve high quality restoration, as quickly as possible. We also welcome the specific reference to achieving BAP targets.</p> <p>The clause relating to treatment of best and most versatile (BMV) agricultural land does not recognise that in some cases, restoration of a site in a way that preserves the soils (or the potential for their re-use for agriculture) is an acceptable alternative to returning the land to agricultural use. We suggest a small addition to this clause to cover this point.</p> <p>Policy M6 clearly defines what forms of restoration are generally encouraged. However, read as a whole (as the policy must be, and will be, by land owners and operators) it does not provide any guidance about what form of restoration is the right one on any given site. For reasons explained above (under our response to paragraph 4.41) we are worried that this will mean Policy M6 is treated as a "checklist" and individual restoration proposals will come forward that try to include a bit of everything - multiple after-uses, even multiple BAP priorities - on each and every site.</p> <p>The Council has already identified a solution, mentioned in paragraph 4.42, to prepare a DPD that will form a framework within which site restoration plans will be considered. We feel very strongly that Policy M6 should include reference to this, and to the desired, strategic approach to restoration that we are sure is the Council's intention. This could be worded as follows (new text underlined):</p> <p>"Policy M6: Restoration of mineral workings</p> <p>Minerals workings should be restored...surrounding landscape and the amenity of local communities. Restoration and after-use should be in accordance with the spatial strategy for the area as outlined in the Sites Development Plan Document. Planning permission will not be</p>

	<p>granted...</p> <p>Where mineral working is proposed on best and most versatile agricultural land, the restoration should be back to agricultural land if this is practicable or to an after-use which preserves the soils for future use, e.g. nature conservation. Where restoration could assist or achieve the creation of priority habitats and/or Oxfordshire Biodiversity Action Plan targets, the relevant biodiversity after-use should be incorporated within the restoration scheme. The choice of habitats should be informed by early discussions with the mineral planning authority and other stakeholders but generally should focus on a limited range of targets that can delivered on a significant scale on the site.</p> <p>Where restoration could protect geodiversity...</p> <p>Where a mineral working site has the potential...</p> <p>Where appropriate, operators and landowners will be expected to contribute towards the management of restored mineral workings for an extended period beyond any formal after-care period, especially in the case of nature conservation restoration."</p>
<p>188 Lafarge</p>	<p>Policy W7: Landfill</p> <p>Policy W7 of the Consultation Draft relates to the disposal of waste to landfill and is stated as follows:</p> <p>"Provision will be made for additional landfill capacity for inert (construction, demolition and excavation) waste which cannot be recycled, at quarries that require infilling for restoration. Permission will normally be granted for disposal of inert waste only where it is required for the restoration of mineral workings or where there would be overall environmental benefit or where there is a demonstrated need that cannot otherwise reasonably be met."</p> <p>Lafarge Response</p> <p>Lafarge Aggregates support the policy that permission will normally be granted for the use of inert waste where it is required for the restoration of mineral workings. This usually complies with the aim of securing recycling of essentially hard, recyclable components and the use of appropriate materials such as soils and subsoils in restoration. It represents a sustainable approach for both the disposal of inert waste and the restoration of mineral workings.</p> <p>Policy W7 is consistent with the Draft Minerals Planning Strategy, which outlines its' vision for the restoration of mineral workings to enhance the natural environment and the quality of life for Oxfordshire's residents. The significance of the restoration process is also set out in Policy M6 of the Draft Minerals Planning Strategy and it is considered that Policy W7 will assist in this process, thereby providing for the restoration and</p>

	improvement of the natural environment.
212 NE	<p>Policy W7</p> <p>We support the disposal of inert waste at quarries which require restoration. We are pleased to see that this policy is in line with intentions in the background paper on Restoration, and intentions in the Minerals Strategy.</p>
POLICY W8: HAZARDOUS WASTE	
226 Nthnts	<p>Hazardous Waste</p> <p>Policy W8 states that "permission will be granted for facilities for the management of hazardous waste where.....they are designed to meet a requirement for the management of waste produced in Oxfordshire". Whereas earlier para 4.70 acknowledges that "...relatively small amounts of different types of hazardous waste to be dealt with, the specialist nature of facilities and the needf or them often to serve a more than local market to be economic, makes it difficult to estimate requirements for the treatment of hazardous waste in Oxfordshire and to identify options for the provision of facilities." These two appear to contradict each other i.e. whilst the context recognises constraints to local markets (economic and operational viability) the policy seeks to only support facilities for express management of Oxfordshire's waste.</p> <p>Northamptonshire County Council therefore objects to the proposed appraoch of continuing to rely on hazardous waste facilities outside Oxfordshire, except for the non-reactive waste allowed for at Ardley. Whilst it is accepted that a facility in wach area is not necessary, it is not correct to draft a policy whose intention is to appear positive but which effectively seeks to rely on other areas providing for Oxfordshire requirements. The policy should therefore be redrafted. The plan should acknowledge that due to economies of scale a hazardous facility in the county is likely to be regional in scale but would not deal with all Oxfordshire's hazardous waste as due to the specialist streams involved most would continue to be exported to be dealt with in other waste planning authority areas.</p>
68 Grundon	<p>Hazardous waste (W8)</p> <p>The supporting wording and policy seem to contradict each other and should aim for self sufficiency in terms of overall provision. The wording states that the County will continue to rely upon out of County facilities whereas the policy seeks to grant permission where facilities manage Oxfordshire waste and where there is a need not provided for elsewhere. There should be an aim for net self sufficiency and not to rely upon the provision of facilities elsewhere.</p>
140 CPRE	<p>Policy W8: Hazardous waste</p> <p>We agree with OCC that the county should continue to rely on hazardous waste facilities outside Oxfordshire, apart from disposal of non-reactive hazardous waste (mainly asbestos) at the existing Ardley landfill.</p>
157	Policy W8

Alk PC	One option for the disposal of hazardous waste, although apparently rejected, was to change a non-hazardous landfill to a hazardous landfill. A list of possible sites is given in clause 4.71. We recommend that Alkerton be deleted from this list because of its remote location (see response on policies W5 and W6 above) even if it were deemed to be a strategic facility. Distances are: Banbury 8.4 km; Stratford upon Avon 24 km; Leamington Spa 30 km; Bicester 42 km; Oxford 53 km.
184 Surrey	Increased specialisation in waste treatment and economies of scale are such that no county is likely to be self-sufficient. Given your relatively central location and good motorway/trunk road and rail links, Oxfordshire may well be an attractive and 'sustainable' location for significant, but not necessarily large-scale, specialist waste facilities. This needs to be recognised in Policy W2, as it is to some extent in Policy W8 and supporting text on hazardous waste, to be consistent with the principles of sustainable development. The policy as drafted, based only on a test of "benefits within Oxfordshire", runs counter, as with your Minerals Plan, to the spirit of the proposed "duty to co-operate".
242 Viridor	<p>Policy W8: Hazardous waste states that 'Permission will be granted for facilities for the management of hazardous waste where:</p> <ul style="list-style-type: none"> - they are designed to meet a requirement for the management of waste produced in Oxfordshire; and - they are reasonably required to meet a need for waste management that is not adequately provided for elsewhere'. <p>This policy is unduly prescriptive and contrary to advice contained within PPS 10. PPS 10 does not include measures to stop waste travelling across local authority boundaries and whilst it advocates self-sufficiency it doesn't seek to create barriers at the boundary of each local authority. PPS 10 seeks to ensure that waste is disposed in one of the nearest appropriate installations - it does not state that waste needs to be disposed within the boundary of the local authority in which it is generated.</p> <p>This policy as drafted to reduce the ability of waste to be disposed of in one of the nearest appropriate locations and is therefore contrary to the provisions of PPS 10.</p>
POLICY W9: RADIOACTIVE WASTE	
12 NW CB	<p>Harwell is located within the North Wessex Downs AONB. Any proposal would have to be small scale to not contradict other Policies within this Plan and indeed national guidance on the need to "conserve and enhance" AONBs.</p> <p>The North Wessex Downs AONB therefore request that Policy W9 be amended to include reference to Harwell's location within an AONB and accordingly the relevant AONB policies within this Plan and existing national guidance.</p>
227 Nthnts	<p>Radioactive Waste</p> <p>This section does not give a compelling case as to why permanent</p>

	<p>radioactive waste disposal is not appropriate at Harwell. It is also not coherent in that it clearly supports movement of radioactive waste from Oxfordshire to Northamptonshire and Cumbria but is not supportive of such movements from Dorset to Oxfordshire.</p> <p>As the subtext appears to be that a suitable disposal facility could be anywhere as long as it is not in Oxfordshire, the plan should give clarification in respect of the statement that granting permission for low level radioactive waste sites only 'if no other suitable disposal facility is available'.</p>
69	<p>Radioactive waste (W9)</p> <p>The policy envisages landfill as the only method of dealing with such waste and that the only source of such waste is from the decommissioning of Harwell. As a result policy is skewed towards storage and disposal to landfill elsewhere. There are a great number of other sources (hospitals, dentists, vets, factories etc) and management techniques for dealing with low level radioactive waste and the policy should not restrict how and where the management of these other wastes is undertaken.</p>
231 RSRL	<p>1. Research Sites Restoration Ltd (RSRL) welcomes the opportunity to submit representations in respect of the Oxfordshire Draft Waste Planning Strategy. Our comments begin with an overview of our business and current operations. They then describe the relevance of the draft Waste Plan to RSRL's operations before focusing on our objection to draft Policy W9 - Radioactive Waste. This sets out the reasons why we believe that the policy should be changed and concludes with our proposed change to the policy. For reasons of consistency, if the County Council accept our position with regard to draft Policy W9 then similar changes should be made to draft Policy W2 - Waste Imports.</p> <p>RESEARCH SITES RESTORATION LTD.</p> <p>2. Research Sites Restoration Limited (RSRL) manages and operates the former United Kingdom Atomic Energy Authority (UKAEA) sites at Harwell in Oxfordshire and Winfrith in Dorset on behalf of the Nuclear Decommissioning Authority (NDA). RSRL is the site licence company responsible for the closure programme at both of these sites.</p> <p>3. Harwell was established in 1946 as Britain's Atomic Energy Research Establishment (AERE) while Winfrith was a major centre for groundbreaking reactor development from the late 1950s. RSRL has held the site licence, waste disposal authorisation and other necessary legal permits for managing the sites since 2009. Before then, the sites were managed by the UKAEA.</p> <p>4. RSRL's mission is to clean up these sites and release the land for alternative uses. Decommissioning will result in the generation of radioactive wastes including low level radioactive wastes (LLW) as well as wastes with higher levels of radioactivity called intermediate</p>

level wastes (ILW). ILW will ultimately be disposed of in a national Geological Disposal Facility (GDF) but this facility will not be available until after 2040. In the meantime the decommissioning of nuclear facilities at Harwell will require the storage of ILW in a new store at the Harwell site.

5. Construction of an ILW storage facility at Harwell could also be designed to accommodate ILW from Winfrith which would avoid the construction of a second smaller capacity store at Winfrith and allow earlier decommissioning and release of the Winfrith site for future use. Such an approach would provide benefits in rationalising the number of ILW stores managed by RSRL, providing benefits in terms of security and economy and therefore delivering a reduction in risk and hazard across the NDA estate.

6. Consideration is being given to storing ILW waste at the Harwell site in a store sized to accept all the expected ILW arisings from decommissioning at Harwell and Winfrith which cannot be accommodated in the existing store at Harwell. Provision of capacity to store ILW arising from the decommissioning of the Joint European Torus (JET) facility and UKAEA Fusion Programme at Culham, Oxfordshire is also being considered as part of the proposed Harwell ILW store.

7. Significantly, it should be recognised that RSRL is looking to develop a facility for the storage of waste rather than for the management, treatment or processing of ILW waste, which are already authorised activities at Harwell including for wastes from Winfrith and the site has an Environmental Permit in place for this. In addition the storage of ILW will be for a finite period pending the long term disposal at the GDF.

8. With regard to Low Level Waste (LLW) while some may need to be disposed of at an existing specialist facility at Drigg in Cumbria or the GDF, the majority will be disposed of in a suitable landfill facility. Harwell is only an interim storage point for LLW which will eventually be removed from the site for disposal elsewhere.

9. The third element of radioactive waste which is of relevance to the draft Waste Plan is Special Nuclear Materials (SNM) which are stored at various sites in the NDA estate including Harwell. As set out below, consideration is being given to the continued storage of the material at Harwell or the transfer of such material to Sellafield.

THE OBJECTIVES OF THE DRAFT WASTE PLAN

10. Paragraph 3.5 of the draft Waste Plan describes eight objectives which set out the principles which underpin the draft Plan. Particular attention is drawn to the following objectives.

i. Provide for waste management capacity that enables Oxfordshire to be net-self sufficient in meeting its own waste needs.

iii. Provide for waste to be managed as close as possible to where it arises to:

- Minimise the distance waste needs to be transported by road;
 - Reduce adverse impact of waste transportation on local communities and the environment;
 - Allow communities to take responsibility for their own waste;
 - And generally provide for a broad distribution of facilities;
- whilst recognising that some types of waste management facility are uneconomic or not practical below a certain size and therefore will need to serve a wider area.

v. Recognise that waste will continue to be imported into Oxfordshire from London and elsewhere ... and seek to limit this to residual waste ... and for the quantity to decrease over time as new facilities are provided where the waste is produced.

vii. Promote sustainable waste practice ... based on the principle of keeping waste to a minimum, managing waste on site...

DRAFT WASTE PLANNING STRATEGY

Waste Imports

11. Paragraph 4.12 of the Draft Waste Plan states that allowance must be made for the movement of some waste across the county boundary. Paragraph 4.15 also states that 'it would be counter-productive to allow new waste management facilities in Oxfordshire predominantly to treat waste from elsewhere'. (Our emphasis) Policy W2, Waste Imports, then goes on to state:

'Provision will be made for disposal of a declining amount of waste from London and elsewhere at existing landfill sites. Facilities which provide substantially for the treatment of waste from outside Oxfordshire will not be permitted unless there would be clear benefits within Oxfordshire.

Hazardous Waste

12. The principles for the treatment of hazardous waste are set out in paragraph 4.66. While in almost all situations radioactive waste is not hazardous waste it is appropriate to consider how the OCC Waste Plan addresses hazardous waste as it has relevance in terms of an approach to waste management. Paragraph 4.66 begins by stating that

'in view of the specialist nature of hazardous waste management facilities they generally serve an area larger than a single county. Hazardous wastes often have to be transported much longer distances

to suitable sites than do other waste types. Oxfordshire is a net exporter of hazardous waste; it is estimated that less than 30% of the hazardous waste produced is currently managed within the county.'

13. Paragraph 4.68 then goes on to state that:

'Oxfordshire should aim to be as self sufficient as is reasonably possible in managing this waste. But hazardous waste comprises different waste materials that require different types of treatment or disposal facility. Many of these facilities will be of a specialist nature and expensive to operate; and will need to serve an area wider than Oxfordshire in order to be viable.'

14. Paragraph 4.70 states that 'where proposed facilities will serve a wider area, they will be regarded as strategic facilities (even if only handle small tonnages) and should be located in accordance with the general policies for location of waste facilities.'

15. At paragraph 4.73 the proposed approach is described as 'to continue to rely on hazardous waste facilities outside Oxfordshire, apart from...' Policy W8, Hazardous Wastes then states that:

'Permission will only be granted for facilities for the management of hazardous waste where:

- They are designed to meet a requirement for the management of waste produced in Oxfordshire; and
- They are reasonably required to meet a need for waste management that is not adequately provided for elsewhere.'

Radioactive Waste

16. Paragraph 4.75 acknowledges that radioactive waste generated in Oxfordshire mainly comprises materials from Harwell and Culham. It also notes that 'The County Council, as waste planning authority, would deal with planning applications for any facilities for storing, managing or disposing of radioactive waste in Oxfordshire.'

Intermediate Level Radioactive Waste Storage

17. Paragraphs 4.76 - 4.80 describe issues relating to intermediate level radioactive waste in Oxfordshire and set out three options for making provision for this waste:

'a) Storage at source of waste: treatment and long-term storage of intermediate level nuclear waste at Harwell (waste from Harwell only); and Culham (waste from Culham only); pending removal to a national disposal facility.

b) Treatment and long-term storage of intermediate level nuclear waste (waste from Harwell and Culham) at Harwell, pending removal to a national disposal facility.

c) Treatment and long-term storage of intermediate level nuclear waste from Oxfordshire (waste from Harwell and Culham) and storage of waste from Dorset (Winfrith) at Harwell, pending removal to a national disposal facility."

18. It notes that an intermediate level radioactive waste store is a specialist facility which would be costly to provide. It also acknowledges that the quantity of waste at Culham is small and there would be economies of scale involved in moving it to a storage facility at Harwell; and the need for a further building in the Green Belt at Culham would be avoided. However, it is concluded that it is not at present clear that there is a justifiable case for bringing waste from Dorset to Harwell and therefore the initial assessment of the County Council is that option b) is the most practical and acceptable option.

19. In summary the County's preferred approach is storage of intermediate level radioactive nuclear legacy waste from sites in Oxfordshire at Harwell, pending removal to a national disposal facility. Any proposal for storage of waste from outside Oxfordshire at Harwell would need to be strongly justified as an exception.

Low Level Radioactive Waste Management

20. Paragraphs 4.81 - 4.84 set out the issues relating to low level radioactive waste management. It recognises that most of the nuclear waste at Harwell and Culham is of low level radioactivity and mainly arises from demolition and clearance of buildings which have a small amount of radioactive contamination but some low level waste may need to be stored for a temporary period to allow radioactive contamination levels to reduce to the appropriate level for safe disposal by landfill. It sets out four options for making provision for this waste:

'a) Temporary storage (if required) and disposal in a bespoke facility at Harwell (waste from Harwell only); and at Culham (waste from Culham only).

b) Temporary storage (if required) of waste at source of waste and disposal in a bespoke facility at Harwell (waste from Harwell and Culham).

c) Temporary storage (if required) of waste at source of waste and disposal in a suitable off-site landfill in Oxfordshire.

d) Temporary storage (if required) of waste at source of waste and disposal in a suitable off-site landfill outside Oxfordshire.'

21. It recognises that it is not clear that the provision of dedicated disposal sites at Harwell and Culham, or just at Harwell, would be practical in terms of viability and availability of suitable site(s) but acknowledges that there is disposal capacity available outside Oxfordshire. The Council's initial assessment is that option d) is the most practical and acceptable option but states that there should be flexibility to reconsider the other options if disposal capacity proves not

to be available outside Oxfordshire.

22. In summary the County's preferred approach is temporary storage (if required) of low level radioactive nuclear legacy waste from Harwell and Culham at the source of the waste and disposal at suitable facilities outside Oxfordshire. However, if capacity is not available at suitable facilities outside Oxfordshire, consideration should be given firstly to disposal at a suitable existing landfill in Oxfordshire; and secondly to disposal at a new bespoke landfill at Harwell.

23. Policy W9, Radioactive Waste, states that:

'Provision will be made for:

- Storage of intermediate level radioactive nuclear legacy waste from sites in Oxfordshire at Harwell, pending removal to a national disposal facility;

- Temporary storage (if required) of low level radioactive nuclear legacy waste at Harwell and Culham.

Broad locations that are proposed for strategic waste facilities are identified in the key diagram (figure 7).

Permission will only be granted for the storage of intermediate level radioactive waste from outside Oxfordshire at Harwell if there is an overriding need and there would be clear benefits within Oxfordshire.

Permission will only be granted for the management or disposal of low level radioactive waste at existing landfill sites or at a new bespoke facility at Harwell if it can be demonstrated that no other suitable disposal facility is available and there is an overriding need to dispose of the waste in Oxfordshire.

Permission will not be granted for the management or disposal of radioactive waste at other locations in Oxfordshire.'

THE POLICY CONTEXT FOR WASTE MANAGEMENT

24. In responding to the draft Waste Plan it is appropriate to comment upon both national planning policy and other national waste strategies. This is an approach which was adopted by the Inspector who reported on the appeal by Augean Plc in respect of the landfill disposal of low-level radioactive waste within a permitted hazardous waste landfill at the East Northants Resource Management Facility, Northamptonshire (APP/K2800/A/10/2126938). In responding to Northamptonshire County Council's attempt to draw a distinction between different types of policy he stated in paragraph 7.16 of his report ' I find no merit in this claimed distinction between national 'planning' and national 'other' policy'. It is also an approach which OCC have adopted during pre-application discussions in respect of RSRL's proposed ILW store at Harwell. As such a national waste strategy can be considered to be a compelling source of policy and is a very material consideration in the

planning decision making process, as evidenced by the Inspector and the Secretary of State in the Augean appeal.

Planning Policy Statement 10

25. PPS10 which sets out the Government's planning policy on waste indicates that planning strategies should help deliver sustainable development and help implement the national waste strategy.

26. The statement sets out a number of key planning objectives to guide planning authorities in preparing and delivering planning strategies to manage waste. Of particular relevance is the fourth key planning objective which states that planning authorities should:

'help secure the recovery or disposal of waste without endangering human health and without harming the environment, and enable waste to be disposed of in one of the nearest appropriate installations;'

27. Annex E provides a range of locational criteria for testing the suitability of sites but also notes that the envisaged waste management facility in terms of type and scale should be taken into account with reference to best available technologies (not involving excessive costs).

Planning Policy Statement 23

28. PPS23: Planning and Pollution Control advises that any consideration of the quality of land air or water and potential impacts arising from development, possibly leading to impacts on health, is capable of being a material planning consideration, in so far as it arises or may arise from or may affect any land use. It also states that the planning system plays a key role in determining the location of development which may give rise to pollution either directly or indirectly, and in ensuring that other uses and developments are not, as far as possible, affected by major existing or potential sources of pollution.

29 Pollution control is concerned with preventing pollution through the use of measures to prohibit or limit the release of substances to the environment from different sources to the lowest practicable level. It also ensures that ambient air and water quality meet standards that guard against impacts to the environment and human health. The planning system should focus on whether the development itself is an acceptable use of the land, and the impacts of those uses, rather than the control of processes or emissions themselves. Planning authorities should work on the assumption that the relevant pollution control regime will be properly applied and enforced. They should act to complement but not seek to duplicate it.

30. The overall aim of planning and pollution control policy is to ensure the sustainable and beneficial use of land. Within this aim,

polluting activities that are necessary for society and the economy should be so sited and planned, and subject to such planning conditions, that their adverse effects are minimised and contained to within acceptable limits.

Waste Strategy for England 2007

31. The Waste Strategy 2007 reiterates the Government's overall objective for waste policy. This is the protection of human health and the environment by producing less waste and by using it as a resource wherever possible. Through more sustainable waste management - reduction, re-use, recycling, composting and using waste as a source of energy - the Government aims to break the link between economic growth and the environmental impact of waste.

32. The purpose of the strategy is to map out, at a high level, the direction of travel over both the medium and longer term for all waste. The strategy and its policies will need to adapt as there are bound to be many external developments to which the Government will need to respond.

33. The strategy includes new policy proposals but further development of some of these policies and detailed action to implement them will continue to be progressed. The strategy includes a high-level implementation plan of the key actions flowing from this strategy including, among other things, the further policy development work to be taken forward and new processes for overseeing implementation.

Government Review of Waste Policy in England 2011

34. Building on the 2007 Strategy the 2011 Review of Waste Policy promotes the further diversion of waste from landfill and supports measures to push waste up the waste hierarchy. The Review also offers support to local authorities in the provision of necessary infrastructure but recognises that local communities should benefit from hosting waste infrastructure and should be involved from an early stage in planning for infrastructure. As this review does not relate to radioactive waste the same principle of the application of the waste hierarchy underpins the assessment of BAT to the management of LLW and ILW. Accordingly any assessment of the need for and the selection of the optimum location for the storage of radioactive materials including LLW and ILW will be based on BAT including the application of the waste hierarchy.

Joint Regulatory Guidance on Radioactive Waste Management

35. With respect to the control of health and environmental impacts as set out in the Joint Regulatory Guidance on Radioactive Waste Management issued by the Health and Safety Executive, the Environment Agency and the Scottish Environment Protection Agency

waste can only be stored when it is demonstrated to the satisfaction of the regulatory agencies that it is in accordance with the Environment Agency Radioactive Substances Regulation Environmental Principles and in particular Principle RSMDP 10:Storage which states:
'Radioactive substances should be stored using the best available techniques so that their environmental risk and environmental impact are minimised and that subsequent management, including disposal is facilitated.'

South East Plan

36. While the government has announced its intention to abolish RSSs the principles set out in the South East Plan have informed the Oxfordshire Waste Plan and have relevance to RSRL's case. The following policies are significant:

Policy W3: Regional Self-Sufficiency

'Waste authorities and waste management companies should provide management capacity equivalent to the amount of waste arising and requiring management within the region's boundaries, plus a declining amount of waste from London...'

Policy W4: Sub-Regional Self-Sufficiency

'Waste Planning Authorities will plan for net self-sufficiency through provision for management capacity equivalent to the amount of waste arising and requiring management within their boundaries. A degree of flexibility should be used in applying the sub-regional self-sufficiency concept. Where appropriate and consistently with Policy W3, capacity should also be provided for:

- waste from London;
- waste from adjoining sub-regions (waste planning authority area within or adjoining the region).'

37. The explanatory text also indicates that sub-regional self-sufficiency will be sought while accepting that movement of waste between sub-regions will occur and is often necessary to reduce long distance transport. The level of self-sufficiency capable of being achieved will depend on:

- the characteristics of the sub-region;
- the nature of the waste stream; and
- the type of facility.

Policy W15: Hazardous and other Specialist Waste Facilities

'The regional planning body, and the South East Regional Technical Advisory Body for waste, through the Hazardous Waste Task Group, will maintain guidance on regional hazardous waste management requirements...'

38. The supporting text states that provision will be required for a small number of large scale specialist facilities for hazardous waste streams. It indicates that waste development documents should identify a range of sites and / or identify criteria for the determination of large scale specialist facilities. These should be located and designed to make use of rail or water transport to reduce the environmental impact.

Policy W16: Waste Transport Infrastructure

'Waste development documents should identify infrastructure facilities, including sites for waste transfer and baulking facilities, essential for the sustainable transport of waste materials. These sites and facilities should be safeguarded in local development documents. Policies should aim to reduce the transport and associated impacts of waste movement. Use of rail and water-borne transport with appropriate depot and wharf provision should be encouraged wherever possible, particularly for large facilities.'

Policy W17: Location of Waste Management Facilities

'Waste development documents will, in identifying locations for waste management facilities, give priority to safeguarding and expanding suitable sites with an existing waste management use and good transport connections. The suitability of existing sites and potential new sites should be assessed on the basis of the following characteristics:

- good accessibility from existing urban areas or major new or planned development;
- good transport connections including, where possible, rail or water;
- compatible land uses, namely:
 - o active mineral working sites;
 - o previous or existing industrial land use
 - o contaminated or derelict land
 - o and adjoining sewage treatment works
 - o redundant farm buildings and their curtilages.
- be capable of meeting a range of locally based environmental criteria.

Waste management facilities should not be precluded from the Green Belt. Small-scale waste management facilities for local needs should not be precluded from AONBs and National Parks where the development would not compromise the objectives of the designation.'

39. The explanatory text advises that facilities will generally be required close to the source of waste and that many will therefore be close to urban areas. Nevertheless, development in the countryside may be the best location for certain activities. Specific reference is made to the Green Belt, AONBs and National Parks. It advises that waste management facilities should not be precluded from such designated areas if the objectives of more environmentally sustainable forms of waste management are to be met. It is also recognised as being

'essential that waste facilities proposed in such areas are assessed in the light of local circumstances and national / regional policy and are subject to good design and landscape character appraisal.' It also recognises that in AONBs, waste facilities will probably be smaller in scale and associated with rural communities.

Nuclear Decommissioning Authority (NDA) Strategy

40. The current national strategy relevant to the decommissioning of nuclear sites is set out in the NDA Strategy effective from April 2011 which is approved by the UK Government and Scottish Ministers. The Strategy is a statutory document which sets the direction for delivery of the nuclear clean-up programme. The Strategy sets out a number of strategic themes including site restoration. Site restoration defines the NDA approach to decommissioning redundant facilities and the management of contamination. It establishes a series of interim states towards an end state at which point the NDA can release the site for other uses. These comprise:

- Decommissioning: to deliver Site End States as soon as reasonably practicable with a progressive reduction in risk and hazard;
- Land Quality Management: To ensure that land quality is managed to protect people and the environment;
- Site End States: To define credible objectives for the restoration of each site (or part of a site).

41. The Strategy recognises that successful site restoration depends upon the availability of suitable waste management routes and facilities. The objective of integrated waste management is to ensure that wastes are managed in a manner that protects people and the environment, now and in the future, and in ways that comply with Government policies and provide value for money. The Strategic decisions about waste management are informed by a number of key principles including risk reduction, waste minimisation, the adoption of the waste hierarchy as a framework for waste management decision making and the consideration of centralised and multi-site approaches where it may be advantageous.

42. In Section 3.4.1 of the Strategy on Higher Activity Waste, which includes ILW there is reference to waste storage consolidation where it is stated (page 41-42) that:

'Until now the approach has been to keep HAW at its site of origin pending geological disposal. Building on the findings reported within the UK HAW Storage Review..., for some of the inventory we will explore opportunities to share current and planned storage assets to improve value for money, reduce the environmental impact of new store build and impact on decommissioning timescales. Subject to the consideration of transport needs, value for money being demonstrated and detailed engagement with interested parties (especially communities neighbouring the sites where waste could be received),

various approaches to waste storage could be adopted across the NDA estate. As part of this programme we will also examine the opportunity for storing some HAW until it becomes LLW by radioactive decay.'

43. The strategy for the management of nuclear materials reflects the current Government policy of safe and secure storage. It acknowledges that the nuclear materials inventory is stored safely and securely on several sites across the NDA estate including Harwell. The strategy notes that the NDA is considering whether consolidated storage is more appropriate for reasons of security and economy.

Research Sites Restoration Ltd: Integrated Waste Strategy

44. Published in March 2011, the RSRL Integrated Waste Strategy (IWS) outlines the current strategy for managing all wastes on the Harwell or Winfrith sites. The key elements of the RSRL IWS are indicated as being:

- The use of the waste hierarchy and Best Practicable Means (BPM) to minimise the volume of waste arisings. Once waste exists then the strategy is to use existing disposal routes or to make wastes passively safe for long term storage.
- The strategy is to convert all historic arisings into a passively safe form, by 2035 at Winfrith and by 2026 at Harwell.
- ILW arising from decommissioning will continue to be stored on each site until a GDF is available for disposal. At Winfrith solid ILW will be stored in a new facility while at Harwell the Vault Store will continue to store legacy wastes until the GDF is available and a new on-site ILW store will be built to take the decommissioning waste. (Legacy waste includes waste resulting from the decommissioning of facilities which are no longer operational or are being used to process or store other legacy waste.)

45. The IWS goes on to identify potential opportunities for improving waste management for consideration by NDA which include:

- Off-site transfer of Special Nuclear Materials (SNM) from Harwell. This is in line with the NDA Integrated Waste Strategy which encourages the optimisation of waste management solutions by using assets across the NDA estate.
- The development of off-site disposal routes for High Volume Low Activity (HVLA) waste.
- Rationalisation of long term interim storage of ILW between sites. A central store serving more than one site could reduce costs.
- Early export of ILW off-site. Significant cost savings can be made if the GDF or interim off-site storage is available early as it would reduce the requirement for long term storage of ILW on both sites.

RSRL'S CASE

46. RSRL welcome the fact that OCC has specifically dealt with issue of radioactive waste in its waste strategy. Such an approach will

provide a degree of certainty for NDA / RSRL / other stakeholders and for the local community.

47. RSRL is keen to work with key stakeholders in the development of its proposals for the site at Harwell and has a long established Local Stakeholder Group which is an independently-chaired forum which meets three times a year. It provides the community with an opportunity to comment on decisions involving the RSRL Harwell site.

48. A national waste strategy can be considered to be a compelling source of policy and is a very material consideration in the planning decision making process, as evidenced by the Inspector and the Secretary of State in the Augean appeal.

49. While some of the principles applied to the management of waste can apply across a number of different waste streams it should be recognised that radioactive waste is specialist area of waste and cannot necessarily be addressed with the same approach as adopted for other waste streams.

50. Waste policies and strategies from the national to the local level adopt a principle of generally treating and storing waste at the source of its generation. Such an approach is appropriate and relates to waste hierarchy, PPS10 and the Government's Waste Strategy.

51. Similarly the principle of self-sufficiency in meeting an area's own needs for the management and disposal of waste is appropriate for the County generally and particularly for general waste. However, as OCC acknowledges in relation to hazardous waste the principle of self-sufficiency should recognise the need for exceptions to the policy.

52. The issue of radioactive waste in Oxfordshire needs to be addressed in terms of the long term NDA strategy and the medium term operation of facilities at Harwell and Winfrith.

53. Although the fourth key planning objectives in PPS10 refers to the disposal of waste the principle is relevant to waste management facilities generally including storage. As written draft Policy W9 prohibits the management of waste that arises outside Oxfordshire at 'one of the nearest appropriate installations' in accordance with PPS 10, if that installation happens to be in Oxfordshire and there are no 'clear benefits within Oxfordshire'

54. Draft Policy W9 also prohibits RSRL from exploring opportunities to share current and planned storage assets to improve value for money, reduce the environmental impact of a new store build and the impact on decommissioning timescales where the option being considered is the storage at Harwell of waste that arises outside Oxfordshire and there are no 'clear benefits within Oxfordshire'. In effect the draft policy restricts the full and proper consideration of the options set out in the

NDA Strategy.

55. For ILW wastes arising outside of Harwell, such as at Culham or Winfrith, in order for that material to be transported to and stored at Harwell it would be necessary for it to be demonstrated to the satisfaction of the Environment Agency that the option for the storage of the material at Harwell is the Best Available Technique which includes an assessment of the selection of the storage location, the alternative management options available and the health and environmental impacts including those associated with transportation.

56. An inconsistent approach has been adopted to ILW waste from Winfrith because it is not within Oxfordshire or the South East Region. It ignores the fact that further economies of scale can be created along with risk reduction and offers potential for the early release of a site situated within an Area of Outstanding Natural Beauty and much of which has a SSSI designation. Both environmental and economic benefits can be demonstrated for the early release of the Winfrith site.

57. In recommending the adoption of option b) for ILW and option d) for LLW the County Council is recognising that the storage of waste at the point of generation is not necessarily the optimum approach and that other issues need to be taken into account. For ILW this relates to benefits of economies of scale in storing Culham waste at Harwell and avoiding additional building in the Green Belt at Culham (while accepting a larger building in the AONB at Harwell).

58. Inconsistency is also apparent in the way in which OCC deals with hazardous waste. OCC acknowledges that it is a net exporter of hazardous waste which is to the advantage of the County. However, it will not accept the same approach in relation to highly specialised radioactive waste (requiring storage rather than treatment) in spite of the economies of scale and wider economic / environmental benefits which would occur in importing such waste.

59. No justification is provided in terms of draft Policy W2 or W9 as to why the benefits should be for Oxfordshire. The proximity principle does not necessarily mean that a County should be self-sufficient in terms of all waste streams.

60. Point 3 of para. 3.5 acknowledges that economic considerations can be taken into account but such a principle is not adopted in the wording of draft Policy W9. Similarly paragraph 4.68 raises the issue of viability but does not currently allow it to be assessed within draft Policy W9.

61. Para. 4.12 recognises that building waste management facilities predominantly for waste from outside the County would be counter-productive but does not rule out the importation of waste entirely. Allowing the storage of ILW waste from Winfrith at Harwell would not be contrary to this principle.

	<p>62. No clear justification is provided for the County's choice of options b) for ILW and d) for LLW compared to other options.</p> <p>63. It should be recognised that the issue with ILW is one of medium term storage rather than treatment / disposal.</p> <p>64. There is no need for the inclusion of a statement about the broad locations for strategic waste facilities within draft Policy W9.</p> <p>Recommendations</p> <p>65. Based on the above review of the policy framework which underpins the preparation of the OCC Waste Plan and the national and local drivers for the treatment of radioactive waste RSRL proposes that draft Policy W9 should be amended as follows.</p> <p>'Provision will be made for:</p> <ul style="list-style-type: none"> - Storage of intermediate level radioactive nuclear legacy waste from sites in Oxfordshire at Harwell, pending removal to a national disposal facility; - Temporary storage (if required) of low level radioactive nuclear legacy waste at Harwell and Culham. <p>Permission will only be granted for the storage of intermediate level radioactive waste from outside Oxfordshire at Harwell if a clear need can be demonstrated and there would be clear economic or environmental benefits and the proposals are in accordance with the relevant national strategy.</p> <p>Permission will only be granted for the management or disposal of low level radioactive waste at existing landfill sites or at a new bespoke facility at Harwell if it can be demonstrated that no other suitable disposal facility is available and there is an overriding need to dispose of the waste in Oxfordshire.</p> <p>Permission will not be granted for the management or disposal of radioactive waste at other locations in Oxfordshire.'</p> <p>66. For consistency Policy W2 should also be amended as follows:</p> <p>'Provision will be made for disposal of a declining amount of waste from London and elsewhere at existing landfill sites. Facilities which provide substantially for the treatment of waste from outside Oxfordshire will not be permitted unless there would be clear economic or environmental benefits and the proposals are in accordance with the relevant national strategy.</p>
141 CPRE	<p>Policy W9: Radioactive waste</p> <p>CPRE agrees with OCC that the preferred approach is storage of</p>

	<p>intermediate level radioactive nuclear legacy waste from sites in Oxfordshire at Harwell, pending removal to a national disposal facility.</p> <p>We also agree that any proposal for storage of waste from outside Oxfordshire at Harwell would need to be strongly justified as an exception.</p> <p>We welcome this proposal particularly because it would prevent the need for a further building in the Green Belt at Culham.</p>
<p>158 Alk PC</p>	<p>Policy W9</p> <p>It is proposed that permission might be granted for the management or disposal of low level radioactive waste at existing landfill sites. We would point out that Alkerton Quarry lies in area with high levels of natural radiation, which is defined as an Affected Area by the NRPB because over 30% of homes contain radiation above the Action Level of 200 Bq/m³. If the Quarry were to take low level radioactive waste, site workers and adjacent residents would be subjected to extra cancer-inducing radioactivity associated with wind-born dust.</p>
<p>166 E Hen</p>	<p>Policy W9: Radioactive waste</p> <p>We note the Council's comments on storage of intermediate level waste. East Hendred Parish Council has seen a recent proposal to transfer the existing higher level nuclear waste at Harwell to Sellafield over a period of a few years as this would improve value for money by concentrating storage at existing sites which will need to continue to be operational in the longer term (until a deep repository is built). As a result of this, we strongly support that storage of intermediate level waste from outside Oxfordshire be rejected, as this would add to the existing inventory and lead to additional transfer requirements to Sellafield.</p> <p>East Hendred Parish Council would object strongly to storage of low level waste at a new bespoke facility at Harwell as it would most likely be within our parish, with an expected lifetime of thousands of years, despite the low level nature of the waste. It is also considered that the store would be built on the chalk base underlying the Harwell site and given the very long timescales involved any protection could be breached, thus contaminating local water sources. East Hendred Parish Council would therefore strongly support disposal in a suitable off-site landfill outside Oxfordshire.</p>
<p>169 Cmbria</p>	<p>Thank you for consulting this authority about your draft Waste Core Strategy. I am assuming that this is a consultation under Regulation 25 rather than Reg 27, please let me know if this is incorrect.</p> <p>Whilst welcoming the inclusion of policies for radioactive wastes, when so many other plans are silent about these waste streams, Cumbria County Council would be obliged to object to the policies that are presented as preferred options.</p> <p>Our main concern is that Oxfordshire appears to be pursuing policies</p>

	<p>that place over-reliance on the willingness and ability of other parts of the country to accept its radioactive wastes. You may appreciate that Cumbria has been on the receiving end of such approaches for a long time and that they are considered to be unsustainable. We will have considerable difficulties in providing for the management of radioactive wastes that arise within Cumbria without the added burden of trying to host facilities for other parts of the country.</p> <p>It appears that, for radioactive wastes, the draft Oxfordshire policies do not accord with the Key Planning Objective in PPS10 of providing a framework in which communities take more responsibility for their own waste. Similarly, they do not appear to be in line with PPS10's Decision-making principle, for all planning strategies, of providing sufficient opportunities to meet the identified needs of the area for the management of all waste streams, nor with your document's paragraph 2.7 or the objectives and principles which are stated to support the Oxfordshire Waste Planning Vision and to underpin the draft plan.</p> <p>The policy of this authority, when faced with proposals for managing decommissioning wastes from nuclear sites within the county and from further afield, is that a sequential approach should be taken. First, there should be a rigorous assessment of the ability of the nuclear site, where the wastes arise, to accommodate the facilities that are needed to manage them or to dispose of them. If that is demonstrated to be impracticable, then land adjacent to the nuclear site should be similarly assessed and, only if that is demonstrated to be impracticable, should more distant facilities be considered.</p> <p>Our understanding is that there has been a rigorous assessment of the Harwell site and that its Integrated Waste Strategy concluded that on-site disposal was the best option.</p> <p>We have followed the Kingscliffe proposal in Northamptonshire with some interest and note that Oxfordshire's V/LLW wastes are considered to likely to be landfilled there. It will be interesting to see if Harwell, as a proposed consignor of waste to that landfill, is able to demonstrate in its application to the Environment Agency for an Environmental Permit, that disposing of these wastes by road transport at such a distance is the best option. In connection with this, we note the information in your document about the substantial remaining capacity in Oxfordshire's existing landfills.</p> <p>This authority has already expressed its concern to the Nuclear Decommissioning Authority, and others, that its efforts are resulting in a continuing succession of ad hoc proposals for radioactive waste management and not in the integrated strategy which we had been expecting through our involvement with the national Strategy Group.</p>
	POLICY W10: SAFEGUARDING
142 CPRE	Policy W10: Safeguarding

	CPRE will respond to in due course to the sites allocations document, which will identify safeguarded sites.
159 Alk PC	<p>Policy W10</p> <p>This says that existing and proposed permanent waste management sites will be safeguarded for waste management use.</p> <p>Please confirm that Alkerton Landfill and Civic Amenity which is temporary will not be safeguarded.</p> <p>Also, if Alkerton Quarry is to be safeguarded, how will the parish council be consulted over the detailed provisions in connection with this site?</p>
218	<p>Policy W10</p> <p>33. In light of the urgent need to ensure that waste management needs are properly managed it is appropriate that waste management sites should be safeguarded from other forms of development. However, given the difficulty in finding suitable sites for waste facilities, as acknowledged at paragraph 4.87 of the OWS, consideration should also be given to safeguarding suitable temporary facilities. This would be in line with policy W17 of the South East Plan, which states that "Waste development plan documents will give priority to safeguarding and expanding suitable sites with an existing waste management use...."</p> <p>The policy makes no distinction between sites with temporary and permanent permissions.</p>
205	<p>Policy W10: Safeguarding (part support, part object)</p> <p>It is not immediately clear how this policy fits in with the purposes of this draft strategy. Whilst the principle of safeguarding is accepted, it is not clear when policy W10 will become relevant and to what sites it does or might apply in the future. If relevant, cross referencing to the site allocations document may help to clarify this point. Flexibility should be introduced to the policy whereby if a site owner can satisfactorily demonstrate that a safeguarded waste site is no longer required then alternative uses can be pursued.</p>
224	<p>Policy W10</p> <p>33. In light of the urgent need to ensure that waste management needs are properly managed it is appropriate that waste management sites should be safeguarded from other forms of development. However, given the difficulty in finding suitable sites for waste facilities, as acknowledged at paragraph 4.87 of the OWS, consideration should also be given to safeguarding suitable temporary facilities. This would be in line with policy W17 of the South East Plan, which states that "Waste development plan documents will give priority to safeguarding and expanding suitable sites with an existing waste management use...."</p> <p>The policy makes no distinction between sites with temporary and permanent permissions.</p>

KEY DIAGRAM	
71 Bucknl	<p>As a local parish council we are concerned about the increased traffic and its resultant pollution. Already our concerns have been expressed about the possible Incinerator at Ardley and its likely effect on traffic plus pollution of air, water and soil.</p> <p>The negative effects for our parish council are twofold---those as a consequence of the proposed Ardley incinerator plus those associated with further housing development in and around Bicester. Developments associated with Bicester could conflict with the eco principles that are supposed to underlie its further development.</p>
110 SODC	This does not appear to show the broad locations of municipal residual waste transfer stations, as referred to in paragraph 4.52.
118 Vale	This does not appear to show the broad locations of municipal residual waste transfer stations, as referred to in paragraph 4.52.
217	<p>Policy W5 states that broad locations for strategic waste facilities are identified in the key diagram (figure 7), and that waste management facilities will be permitted at suitable sites within these broad locations. It is, however, not at all clear from Figure 7 what the broad locations comprise.</p> <p>31. Black boxes are shown on the diagram, which the key identifies as "Proposed new facilities", and these black boxes are shown next to various centres of population. However, the extent of the broad locations is not clear. For example, there is a black box south of Abingdon, but is this also meant to encompass Wantage & Grove and Didcot (areas also referred to in Policy W5); a black box is shown north of Bicester, but would this also include the existing Ardley waste facilities;</p> <p>a black box is shown north of Witney, but could this include other areas around Witney and/or the close by Stanton Harcourt facilities?</p> <p>32. As currently drafted Figure 7 is far too ambiguous and can be widely interpreted. What do the words of the policy of "within these broad locations" mean? A more accurate means of defining broad locations should be formulated, to give the certainty that the plan should provide.</p>
181	<p>Policy W5 addresses the provision of additional waste management facilities in Oxfordshire and states that broad locations for strategic waste facilities are identified in Figure 7. We note that on Figure 7 Finmere Quarry is identified as a non hazardous landfill but the MRF is not identified. Given that the two facilities are inextricably linked as the residues from the MRF are deposited in the non hazardous landfill we should be grateful if the MRF could be referred to in the submission draft of the Waste Planning Strategy.</p> <p>Should you have any queries please do not hesitate to contact us.</p>
213 NE	Figure 7 Waste Key Diagram shows a new facility in the Henley on Thames area, within the Chilterns AONB. This proposal will need to be assessed against the purposes of the AONB to ensure that it does not

	have a detrimental effect.
223	<p>Policy W5 states that broad locations for strategic waste facilities are identified in the key diagram (figure 7), and that waste management facilities will be permitted at suitable sites within these broad locations. It is, however, not at all clear from Figure 7 what the broad locations comprise.</p> <p>31. Black boxes are shown on the diagram, which the key identifies as "Proposed new facilities", and these black boxes are shown next to various centres of population. However, the extent of the broad locations is not clear. For example, there is a black box south of Abingdon, but is this also meant to encompass Wantage & Grove and Didcot (areas also referred to in Policy W5); a black box is shown north of Bicester, but would this also include the existing Ardley waste facilities; a black box is shown north of Witney, but could this include other areas around Witney and/or the close by Stanton Harcourt facilities?</p> <p>32. As currently drafted Figure 7 is far too ambiguous and can be widely interpreted. What do the words of the policy of "within these broad locations" mean? A more accurate means of defining broad locations should be formulated, to give the certainty that the plan should provide.</p>
CORE POLICIES	
<i>See separate Report</i>	
IMPLEMENTATION AND MONITORING	
72 Bucknl	<p>The Waste Draft Plan does little to allay the fears already expressed and indicated briefly in the paragraph above. Indeed the plan is rather wide-ranging and we would suggest that it requires a more precise and dated development. It would be wiser to draw up a planned framework that clearly indicates what would be done, why it would be carried out, where it would be carried out, when it would be started and completed, who would oversee each section, and finally, what the cost would be. As the plan stands it is merely full of intentions without obvious due regard to timing, cost and the effects on local communities. In summary, the draft plan needs to be broken down into timed and manageable units.</p>
164 Alk PC	<p>Implementation and monitoring 6.20 OCC will continue producing an annual monitoring report. We think this may not be adequate. We recommend that reports should be produced monthly for the benefit of local communities. Furthermore, provision should be made to provide funds to local communities to enable them to carry out their own monitoring which would be independent of commercial interests.</p>
245	<p>(Chap 6) Monitoring Strategy refers to Annual Monitoring reports - covering for example waste imports; numbers of site permissions; and transport permissions (that would adversely affect residential amenity)</p> <p>We would like to see much more specific criteria in relation to targets,</p>

	<p>and the protocol for for applying these and the taking of action where abuses occur. Based on our experience of how OCC implements CLUED permissions/ licences, we have little confidence in the value of a monitoring framework - that appears to have no teeth.</p> <p>A good first step would be a review of existing permissions (and CLUEDs) and whether the conditions were being adhered to</p>
<p>ANNEX 1 (OVERALL PROVISION)</p>	
5	<p>Your waste consultation strategy lacks detail. One might even say it is obfuscatory. However I believe that it plans the closure of thge Stanford in the Vale recycling centre. I believe this to be a big mistake as it will certainly increase fly tipping in the area it presently serves namely Wantage and Faringdon. Fly tipping is expensive to clear up and offenders are rarely caught.</p> <p>The consultation itself is inadequately publicised to the general public and reflects the general insensitivity of Oxfordshire CC to the view of the citizenry to the the its provison of services.</p>
13 Sib PC	<p>Sibford Gower Parish Council has instructed me to advise you that it strongly supports Draycot Parish Council's view that the waste site at Alkerton should not be closed.</p>
24 Far TC	<p>Faringdon Town Council has considered the Oxfordshire County Council draft Waste Plan to 2030 and would like to make the following comments:-</p> <p>1. Faringdon Town Council objects to the closure of the site at Stanford in the Vale. Closure of this site wuld result in a large area of the south-west of the county with no household recycling facility, with the nearest then being at Drayton or Redbridge, the consequence of which would be an increase in fly-tipping or other inappropriate disposal;</p>
49	<p>With concerns already raised regarding possible over-estimation of need for C&I waste, confidence is not increased by paragraphs within the Oxfordshire Minerals and Waste Development Framework/Waste Needs Assessment Document (May 2011) stating, 'there is considerable uncertainty around the amount of C&I waste arising in Oxfordshire' (para 3.19) and 'it is difficult to assess the extent ot which waste arisings are currently affected by the economic downturn' (para 3.27). In the same document, para 6.8 states that the C&I capacity gap (which doesn't occur until 2020) 'is largely a theoretical one'. It goes on to state that 'there presently appears to be a healthy surplus of capacity. This may explain why facilities that have been granted planning permission have not yet been built.' The question is - is there a likely shortfall or not? The draft strategy concludes there is one. However, reading between the lines, this conclusion appears extremely tenuous.</p> <p>Moving on to the recommendation for new residual treatment provision of 220,000 tonnes per annum for C&I waste, this needs to be reviewed further. If Ardley's EfW plant goes ahead, the understanding is that only 50% of the plant's capacity will be dedicated to Oxfordshire's waste because of demand from outside the county. Is there not a strong case for reviewing this contract should demand for the plant from</p>

	<p>outside the county not prove as strong as forecast? Also, there appears to be no consideration of permitted plants that have yet to be built (e.g. the 90,000 tpa Finmere Gasification Plant) that would also reduce needs.</p> <p>It's hard to get away from the lack of clarity in the draft document that leads to various of its conclusions.</p>
INTERNAL RESPONSES (OCC RESPONSIBLE OFFICER)	
<p>Frankie Upton</p> <p>Waste Management Group</p> <p>Vision W1 W3 W5 W6</p>	<p>Vision and objectives</p> <p>As WDA we support the overall vision and objectives of the draft waste planning strategy. The objective to transform the way waste is dealt with by increasing recycling, composting and treatment of waste and to minimise the disposal of waste to landfill is aligned with the aims of Oxfordshire Joint Municipal Waste Management Strategy (OJMWMS) and for municipal waste significant progress towards achieving this objective has been over the past 5 years.</p> <p>Oxfordshire is one of the best in the country for recycling and composting and is currently recycling and composting over 62% of the county's municipal waste. This has been achieved through the implementation of the OJMWMS by all the constituent authorities. The Waste Collection Authorities (WCAs) have made changes to their collection arrangements to introduce more comprehensive recycling collections. OCC as WDA let a contract for food waste treatment and the infrastructure already provided has enabled the introduction of weekly food waste collections from households across the county. The award of a contract for residual waste treatment will see nearly all municipal waste diverted from landfill when the EfW facility at Ardley becomes operational in 2014/15.</p> <p>Waste prevention and re-use are at the top of the waste hierarchy but the draft waste strategy explicitly does not address prevention and re-use as they are considered to be beyond the remit of land use planning. This is acknowledged, and prevention and re-use is encouraged by the OJMWMS and pursued by the Oxfordshire Waste Partnership (OWP) through a waste prevention strategy. This includes a broad variety of information and campaign initiatives to enable greater prevention and re-use, most of which do not require dedicated sites or buildings. However, as WDA we consider that the draft waste strategy could also usefully help support prevention and re-use by supporting the development of any facilities that may be required. For example, in future this could include the provision of re-use shops at HWRCs or at other locations, such as proposals that are currently being investigated in partnership with the local community group, the district council and the WDA for a re-use and repair shop in Bicester.</p>

Quantity of waste

We support the overall approach taken to estimating the amount of municipal waste to be managed in the future. The assumption that there will be no further increase in the amount of waste produced per household from 2012 is in accordance with the OJMWMS. For information municipal waste arisings have been decreasing in recent years and are currently lower than the 2010 base date in the draft strategy. In 2010/11 about 300,166 tonnes of municipal waste were produced. While we expect arisings to increase in the future in particular due to housing growth, the estimates in the strategy in the short term may be too high.

Waste management targets

The OJMWMS is currently being reviewed and as 62% recycling and composting is currently being achieved compared to a target of 55% by 2020 the targets will increase, although it is too early in the review to give an indication of what they might be. The timetable for the OJMWMS is for consultation on the draft early in 2012 followed by approval by the OWP and the constituent authorities later in the spring.

Provision of waste management facilities

We support the proposed provision for municipal waste management facilities, and in particular the HWRC to serve Banbury and transfer stations for bulking of residual waste for transport to the EfW facility at Ardley. However, the provision of residual waste transfer stations will be made following a competitive procurement and while the reference to Abingdon/Didcot/Wantage & Grove, and the Witney/Carterton areas is helpful we consider it is too prescriptive. A reference to the provision of transfer stations conveniently located to serve South Oxfordshire, the Vale and West Oxfordshire would provide more flexibility.

We note that the key diagram includes the HWRCs that are proposed to be retained under the current strategy for HWRCs, and also includes the new locations for HWRCs at Kidlington and to serve Banbury. While it is our intention to close the HWRCs at Alkerton, Ardley and Stanford in the Vale, it is possible that in future alternative ways of providing recycling facilities could be sought, for example small scale community recycling facilities either at the site of an existing HWRC, or on new sites such as being investigated by West Oxfordshire District Council at Chipping Norton. It would be helpful if the draft waste strategy could include an explicit reference to such facilities and support

	<p>their location on existing HWRC sites and in other locations in accordance with policy W6.</p> <p>Also on the key diagram we note that the HWRC in the general location of Redbridge is shown as a household waste recycling centre. However, Redbridge also takes trade waste and in future is planned to open for trade use only during the week days and for householders at weekends. We consider that this should be reflected on the key diagram.</p> <p>Correction</p> <p>P17, para 2.25 – in the first sentence “Oxfordshire Joint Municipal Waste Partnership” should read the “Oxfordshire Waste Partnership”.</p>
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